

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Maria del Carmen Mendez Castro; Ramiro Gonzalez Juarez; Rodrigo Galindo Gutierrez; Jahir Alfonso Vergara Maza; Jose Luis Gonzalez Juarez; Sara Mendez Castro; Brandon Brito Gonzalez; Marco Antonio Olivares Perez; Roberto Antonio Cuamba Razo; and John Doe 1-20.

Plaintiffs,

v.

MIDWEST RIDES and Concessions Inc.; Mad-Jax Amusements Inc., including dba Midwest Rides and Concessions; James Waknitz; Rochelle Waknitz; ATJ Labor Consulting LLC; Alejandro Trevino Jr.; T.J. Reinke; and John Doe,

Defendants.

Case No. 16-CV-00014 (DWF/SER)

**DEFENDANTS ATJ LABOR  
CONSULTING LLC AND  
ALEJANDRO TREVINO JR.'S  
ANSWER TO AMENDED  
COMPLAINT**

**DEMAND FOR JURY TRIAL**

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Defendants ATJ Labor Consulting LLC (“ATJ”) and Alejandro Trevino Jr. (“Trevino”) (jointly, “Defendants”), by their undersigned attorneys, and for their Answer to Plaintiffs’ Amended Complaint in the above-entitled matter, hereby deny each and every allegation, matter, and thing contained in Plaintiffs’ Amended Complaint except as hereinafter expressly admitted, qualified or otherwise stated, and further answer the Amended Complaint as follows:

**JURISDICTION AND VENUE**

1. Paragraph 1 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

2. Paragraph 2 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

3. Paragraph 3 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

4. Paragraph 4 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

5. Paragraph 5 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

6. Paragraph 6 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

7. Paragraph 7 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that

the law regarding supplemental jurisdiction speaks for itself. Please also see Defendants' affirmative and other defenses.

8. With respect to Paragraph 8 of Plaintiffs' Amended Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants lack sufficient information to admit or deny the remaining allegations in Paragraph 8 of Plaintiffs' Amended Complaint and therefore deny same.

9. With respect to Paragraph 9 of Plaintiffs' Amended Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants lack sufficient information to admit or deny the remaining allegations in Paragraph 9 of Plaintiffs' Amended Complaint and therefore deny same.

10. With respect to Paragraph 10 of Plaintiffs' Amended Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants lack sufficient information to admit or deny the remaining allegations in Paragraph 10 of Plaintiffs' Amended Complaint and therefore deny same.

11. With respect to Paragraph 11 of Plaintiffs' Amended Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no

response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants lack sufficient information to admit or deny the remaining allegations in Paragraph 11 of Plaintiffs' Amended Complaint and therefore deny same.

12. With respect to Paragraph 12 of Plaintiffs' Amended Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants deny the remaining allegations in Paragraph 12 of Plaintiffs' Amended Complaint.

13. With respect to Paragraph 13 of Plaintiffs' Amended Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants deny the remaining allegations in Paragraph 13 of Plaintiffs' Amended Complaint.

14. With respect to Paragraph 14 of Plaintiffs' Amended Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants lack sufficient information to admit or deny the remaining allegations in Paragraph 14 of Plaintiffs' Amended Complaint and therefore deny same.

15. Paragraph 15 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 15 of Plaintiffs' Amended Complaint.

16. Paragraph 16 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 16 of Plaintiffs' Amended Complaint.

17. Paragraph 17 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 17 of Plaintiffs' Amended Complaint.

18. Paragraph 18 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 18 of Plaintiffs' Amended Complaint.

### **PARTIES**

19. Defendants admit the allegations in Paragraph 19 of Plaintiffs' Amended Complaint, upon information and belief.

20. Defendants lack sufficient information to admit or deny the allegations in Paragraph 20 of Plaintiffs' Amended Complaint and therefore deny same.

21. Defendants lack sufficient information to admit or deny the allegations in Paragraph 21 of Plaintiffs' Amended Complaint and therefore deny same.

22. Defendants lack sufficient information to admit or deny the allegations in Paragraph 22 of Plaintiffs' Amended Complaint and therefore deny same.

23. Defendants lack sufficient information to admit or deny the allegations in Paragraph 23 of Plaintiffs' Amended Complaint and therefore deny same.

24. Defendants lack sufficient information to admit or deny the allegations in Paragraph 24 of Plaintiffs' Amended Complaint and therefore deny same.

25. Defendants lack sufficient information to admit or deny the allegations in Paragraph 25 of Plaintiffs' Amended Complaint and therefore deny same.

26. Defendants lack sufficient information to admit or deny the allegations in Paragraph 26 of Plaintiffs' Amended Complaint and therefore deny same.

27. Defendants lack sufficient information to admit or deny the allegations in Paragraph 27 of Plaintiffs' Amended Complaint and therefore deny same.

28. Defendants lack sufficient information to admit or deny the allegations in Paragraph 28 of Plaintiffs' Amended Complaint and therefore deny same.

29. Defendants lack sufficient information to admit or deny the allegations in Paragraph 29 of Plaintiffs' Amended Complaint and therefore deny same.

30. Defendants lack sufficient information to admit or deny the allegations in Paragraph 30 of Plaintiffs' Amended Complaint and therefore deny same.

31. Defendants lack sufficient information to admit or deny the allegations in Paragraph 31 of Plaintiffs' Amended Complaint and therefore deny same.

32. Defendants lack sufficient information to admit or deny the allegations in Paragraph 32 of Plaintiffs' Amended Complaint and therefore deny same.

33. Defendants lack sufficient information to admit or deny the allegations in Paragraph 33 of Plaintiffs' Amended Complaint and therefore deny same.

34. Defendants lack sufficient information to admit or deny the allegations in Paragraph 34 of Plaintiffs' Amended Complaint and therefore deny same.

35. Defendants lack sufficient information to admit or deny the allegations in Paragraph 35 of Plaintiffs' Amended Complaint and therefore deny same.

36. Paragraph 36 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

37. Defendants lack sufficient information to admit or deny the allegations in Paragraph 37 of Plaintiffs' Amended Complaint and therefore deny same.

38. Defendants lack sufficient information to admit or deny the allegations in Paragraph 38 of Plaintiffs' Amended Complaint and therefore deny same.

39. Defendants lack sufficient information to admit or deny the allegations in Paragraph 39 of Plaintiffs' Amended Complaint and therefore deny same.

40. Defendants lack sufficient information to admit or deny the allegations in Paragraph 40 of Plaintiffs' Amended Complaint and therefore deny same.

41. Defendants lack sufficient information to admit or deny the allegations in Paragraph 41 of Plaintiffs' Amended Complaint and therefore deny same.

42. Defendants lack sufficient information to admit or deny the allegations in Paragraph 42 of Plaintiffs' Amended Complaint and therefore deny same.

43. Defendants lack sufficient information to admit or deny the allegations in Paragraph 43 of Plaintiffs' Amended Complaint and therefore deny same.

44. Defendants lack sufficient information to admit or deny the allegations in Paragraph 44 of Plaintiffs' Amended Complaint and therefore deny same.

45. Defendants lack sufficient information to admit or deny the allegations in Paragraph 45 of Plaintiffs' Amended Complaint and therefore deny same.

46. Defendants lack sufficient information to admit or deny the allegations in Paragraph 46 of Plaintiffs' Amended Complaint and therefore deny same.

47. Defendants lack sufficient information to admit or deny the allegations in Paragraph 47 of Plaintiffs' Amended Complaint and therefore deny same.

48. Defendants lack sufficient information to admit or deny the allegations in Paragraph 48 of Plaintiffs' Amended Complaint and therefore deny same.

49. Defendants lack sufficient information to admit or deny the allegations in Paragraph 49 of Plaintiffs' Amended Complaint and therefore deny same.

50. Defendants lack sufficient information to admit or deny the allegations in Paragraph 50 of Plaintiffs' Amended Complaint and therefore deny same.

51. Defendants lack sufficient information to admit or deny the allegations in Paragraph 51 of Plaintiffs' Amended Complaint and therefore deny same.

52. Defendants lack sufficient information to admit or deny the allegations in Paragraph 52 of Plaintiffs' Amended Complaint and therefore deny same.

53. Defendants lack sufficient information to admit or deny the allegations in Paragraph 53 of Plaintiffs' Amended Complaint and therefore deny same.

54. Defendants lack sufficient information to admit or deny the allegations in Paragraph 54 of Plaintiffs' Amended Complaint and therefore deny same.

55. Defendants lack sufficient information to admit or deny the allegations in Paragraph 55 of Plaintiffs' Amended Complaint and therefore deny same.

56. Defendants lack sufficient information to admit or deny the allegations in Paragraph 56 of Plaintiffs' Amended Complaint and therefore deny same.

57. Paragraph 57 of Plaintiffs' Amended Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required, Defendants state that the information provided in Paragraph 51 of Plaintiffs' Amended Complaint speaks for itself.

58. Paragraph 58 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding employer status speaks for itself.

59. Defendants lack sufficient information to admit or deny the allegations in Paragraph 59 of Plaintiffs' Amended Complaint and therefore deny same.

60. Defendants lack sufficient information to admit or deny the allegations in Paragraph 60 of Plaintiffs' Amended Complaint and therefore deny same.

61. Defendants lack sufficient information to admit or deny the allegations in Paragraph 61 of Plaintiffs' Amended Complaint and therefore deny same.

62. Defendants lack sufficient information to admit or deny the allegations in Paragraph 62 of Plaintiffs' Amended Complaint and therefore deny same.

63. Paragraph 63 of Plaintiffs' Amended Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is

required, Defendants state that the information provided in Paragraph 63 of Plaintiffs' Amended Complaint speaks for itself.

64. Defendants lack sufficient information to admit or deny the allegations in Paragraph 64 of Plaintiffs' Amended Complaint and therefore deny same.

65. Defendants lack sufficient information to admit or deny the allegations in Paragraph 65 of Plaintiffs' Amended Complaint and therefore deny same.

66. Defendants lack sufficient information to admit or deny the allegations in Paragraph 66 of Plaintiffs' Amended Complaint and therefore deny same.

67. Defendants lack sufficient information to admit or deny the allegations in Paragraph 67 of Plaintiffs' Amended Complaint and therefore deny same.

68. Defendants lack sufficient information to admit or deny the allegations in Paragraph 68 of Plaintiffs' Amended Complaint and therefore deny same.

69. Defendants lack sufficient information to admit or deny the allegations in Paragraph 69 of Plaintiffs' Amended Complaint and therefore deny same.

70. Defendants lack sufficient information to admit or deny the allegations in Paragraph 70 of Plaintiffs' Amended Complaint and therefore deny same.

71. Defendants admit the allegations in Paragraph 71 of Plaintiffs' Amended Complaint.

72. Defendants admit the allegations in Paragraph 72 of Plaintiffs' Amended Complaint.

73. Defendants admit the allegations in Paragraph 73 of Plaintiffs' Amended Complaint.

74. Defendants admit the allegations in Paragraph 74 of Plaintiffs' Amended Complaint.

75. Defendants admit the allegations in Paragraph 75 of Plaintiffs' Amended Complaint.

76. Defendants admit the allegations in Paragraph 76 of Plaintiffs' Amended Complaint.

77. Defendants admit the allegations in Paragraph 77 of Plaintiffs' Amended Complaint.

78. Defendants admit the allegations in Paragraph 78 of Plaintiffs' Amended Complaint.

79. Defendants deny the allegations in Paragraph 79 of Plaintiffs' Amended Complaint.

80. Defendants deny the allegations in Paragraph 80 of Plaintiffs' Amended Complaint.

81. Defendants deny the allegations in Paragraph 81 of Plaintiffs' Amended Complaint.

82. Defendants deny the allegations in Paragraph 82 of Plaintiffs' Amended Complaint.

83. Defendants lack sufficient information to admit or deny the allegations in Paragraph 83 of Plaintiffs' Amended Complaint and therefore deny same.

84. Defendants lack sufficient information to admit or deny the allegations in Paragraph 84 of Plaintiffs' Amended Complaint and therefore deny same.

85. Paragraph 85 of Plaintiffs' Amended Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required, Defendants state that the information provided in Paragraph 85 of Plaintiffs' Amended Complaint speaks for itself.

### **STATEMENT OF ALLEGED FACTS**

#### **Defendants and Related Companies**

86. Defendants admit the allegations in Paragraph 86 of Plaintiffs' Amended Complaint, upon information and belief.

87. Defendants lack sufficient information to admit or deny the allegations in Paragraph 87 of Plaintiffs' Amended Complaint and therefore deny same.

88. Defendants lack sufficient information to admit or deny the allegations in Paragraph 88 of Plaintiffs' Amended Complaint and therefore deny same.

89. Defendants lack sufficient information to admit or deny the allegations in Paragraph 89 of Plaintiffs' Amended Complaint and therefore deny same.

90. Defendants lack sufficient information to admit or deny the allegations in Paragraph 90 of Plaintiffs' Amended Complaint and therefore deny same.

91. Defendants lack sufficient information to admit or deny the allegations in Paragraph 91 of Plaintiffs' Amended Complaint and therefore deny same.

92. Defendants admit the allegations in Paragraph 92 of Plaintiffs' Amended Complaint.

93. Defendants admit the allegations in Paragraph 93 of Plaintiffs' Amended Complaint.

94. Defendants admit the allegations in Paragraph 94 of Plaintiffs' Amended Complaint.

95. Defendants lack sufficient information to admit or deny the allegations in Paragraph 95 of Plaintiffs' Amended Complaint and therefore deny same.

96. Defendants lack sufficient information to admit or deny the allegations in Paragraph 96 of Plaintiffs' Amended Complaint and therefore deny same.

97. Defendants lack sufficient information to admit or deny the allegations in Paragraph 97 of Plaintiffs' Amended Complaint and therefore deny same.

98. Defendants lack sufficient information to admit or deny the allegations in Paragraph 98 of Plaintiffs' Amended Complaint and therefore deny same.

99. Defendants lack sufficient information to admit or deny the allegations in Paragraph 99 of Plaintiffs' Amended Complaint and therefore deny same.

100. Defendants lack sufficient information to admit or deny the allegations in Paragraph 100 of Plaintiffs' Amended Complaint and therefore deny same.

101. Defendants lack sufficient information to admit or deny the allegations in Paragraph 101 of Plaintiffs' Amended Complaint and therefore deny same.

102. Defendants admit the allegations in Paragraph 102 of Plaintiffs' Amended Complaint.

#### **Alleged Fraudulent H-2B Applications and Recruitment of Mexican Workers**

103. Defendants admit the allegations in Paragraph 103 of Plaintiffs' Amended Complaint, upon information and belief.

104. Paragraph 104 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal provisions speak for themselves.

105. Defendants admit the allegation in Paragraph 105 of Plaintiffs' Amended Complaint.

106. Paragraph 106 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal provisions speak for themselves.

107. Paragraph 107 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal provisions and DOL requirements speak for themselves.

108. Paragraph 108 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal provisions speak for themselves.

109. Paragraph 109 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal requirements regarding the Form ETA 9142B speak for themselves.

110. Paragraph 110 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal requirements regarding the Form ETA 9142B speak for themselves.

111. Defendants admit Paragraph 111 of Plaintiffs' Amended Complaint. Defendants further state that Exhibit J of Plaintiffs' Amended Complaint speaks for itself.

112. Paragraph 112 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 106 of Plaintiffs' Amended Complaint.

113. With respect to Paragraph 113 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself.

114. With respect to Paragraph 114 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself.

115. With respect to Paragraph 115 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself.

116. With respect to Paragraph 116 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself.

117. With respect to Paragraph 117 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself.

118. With respect to Paragraph 118 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself, including the SOC occupation description.

119. With respect to Paragraph 119 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself, including the SOC occupation description.

120. With respect to Paragraph 120 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself, including the worksite listed on said Form.

121. With respect to Paragraph 121 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself, including the list of anticipated worksites.

122. With respect to Paragraph 122 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself, including the case number provided.

123. With respect to Paragraph 123 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Amended Complaint) speaks for itself, including the prevailing wage determination.

124. With respect to Paragraph 124 of Plaintiffs' Amended Complaint, Defendants state that the ETA Form 9142B speaks for itself, including the date of submission of said form.

125. Paragraph 125 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 125 of Plaintiffs' Amended Complaint.

126. With respect to Paragraph 126 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the job title listed on said documents.

127. With respect to Paragraph 127 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the SOC code.

128. With respect to Paragraph 128 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the listed SOC occupation.

129. With respect to Paragraph 129 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the listed position status.

130. With respect to Paragraph 130 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the position start date.

131. With respect to Paragraph 131 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the position end date.

132. With respect to Paragraph 132 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the representations made to the DOL regarding months of operation per calendar year.

133. Defendants lack sufficient information to admit or deny the allegations in Paragraph 133 of Plaintiffs' Amended Complaint and therefore deny same.

134. With respect to Paragraph 134 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the number of worker positions requested for certification.

135. With respect to Paragraph 135 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the legal business name for the employer appearing on the labor certification.

136. With respect to Paragraph 136 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the trade name and/or labor "dba" appearing on said documents.

137. With respect to Paragraph 137 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the individual identified as owner and/or point of contact on said documents.

138. With respect to Paragraph 138 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the anticipated hours worked per week indicated on said documents.

139. With respect to Paragraph 139 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the proposed work schedule indicated on said documents.

140. With respect to Paragraph 140 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the referenced pay and salary information.

141. With respect to Paragraph 141 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the referenced wage calculation (40 hours per week x \$9.68). Defendants lack sufficient information to directly admit or deny Defendant Midwest's representations, and therefore deny same.

142. With respect to Paragraph 142 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves.

143. With respect to Paragraph 143 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves.

144. With respect to Paragraph 144 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the case number assigned.

145. With respect to Paragraph 145 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the date of the DOL's certification for twenty-eight temporary workers.

146. With respect to Paragraph 146 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including Defendant Midwest's representations.

147. Defendants lack sufficient information to admit or deny the allegations in Paragraph 147 of Plaintiffs' Amended Complaint and therefore deny same.

148. Defendants admit the allegations in Paragraph 148 of Plaintiffs' Amended Complaint, upon information and belief.

149. Paragraph 149 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegation in Paragraph 149 of Plaintiffs' Amended Complaint. Further answering, Defendants state that the subject visa petitions speak for themselves.

150. Defendants lack sufficient information to admit or deny the allegations in Paragraph 150 of Plaintiffs' Amended Complaint and therefore deny same. Further answering, Defendants state that the subject visa petitions speak for themselves.

151. Defendants lack sufficient information to admit or deny the allegations in Paragraph 151 of Plaintiffs' Amended Complaint and therefore deny same, except state upon information and belief that the subject visa petitions were approved.

152. Paragraph 152 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegation in Paragraph 152 of Plaintiffs' Amended Complaint. Further answering, Defendants state that the subject visa petitions speak for themselves.

153. With respect to Paragraph 153 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the number of workers for which Crescent City petitioned. Defendants admit the remaining

allegations in Paragraph 153 of Plaintiffs' Amended Complaint, upon information and belief.

154. With respect to Paragraph 154 of Plaintiffs' Amended Complaint, Defendants state that the subject documents speak for themselves, including the number of workers for which Shamrock petitioned. Defendants admit the remaining allegations in Paragraph 154 of Plaintiffs' Amended Complaint, upon information and belief.

155. Defendants admit the allegations in Paragraph 155 of Plaintiffs' Amended Complaint.

156. Defendants admit the allegations in Paragraph 156 of Plaintiffs' Amended Complaint.

157. Defendants deny the allegations in Paragraph 157 of Plaintiffs' Amended Complaint.

158. Defendants deny the allegations in Paragraph 158 of Plaintiffs' Amended Complaint.

159. Defendants admit the allegations in Paragraph 159 of Plaintiffs' Amended Complaint.

160. Defendants admit the allegations in Paragraph 160 of Plaintiffs' Amended Complaint.

161. Defendants deny the allegations in Paragraph 161 of Plaintiffs' Amended Complaint, except state that individuals seeking a visa were required to pay the requisite Application Service Center fee in addition to covering other expenses, and individuals seeking a visa were told to meet in Matamoros.

162. Defendants lack sufficient information to admit or deny the allegations in Paragraph 162 of Plaintiffs' Amended Complaint and therefore deny same, except state that individuals were required to cover various costs.

163. Defendants admit the allegations in Paragraph 163 of Plaintiffs' Amended Complaint, and clarify that Defendant Alejandro Trevino was the only "agent."

164. Defendants lack sufficient information to admit or deny the allegation in Paragraph 164 of Plaintiffs' Amended Complaint and therefore deny same.

165. Defendants deny the allegations in Paragraph 165 of Plaintiffs' Amended Complaint.

166. Defendants deny the allegations in Paragraph 166 of Plaintiffs' Amended Complaint.

167. Defendants lack sufficient information to admit or deny the allegations in Paragraph 167 of Plaintiffs' Amended Complaint and therefore deny same.

168. Defendants lack sufficient information to admit or deny the allegations in Paragraph 168 of Plaintiffs' Amended Complaint and therefore deny same.

169. Defendants lack sufficient information to admit or deny the allegations in Paragraph 169 of Plaintiffs' Amended Complaint and therefore deny same.

170. Defendants admit the allegations in Paragraph 170 of Plaintiffs' Amended Complaint.

171. Defendants admit the allegations in Paragraph 171 of Plaintiffs' Amended Complaint.

172. Defendants deny the allegations in Paragraph 172 of Plaintiffs' Amended Complaint, except state individuals seeking visas to lawfully work within the United States were provided with the pertinent information regarding their potential work in the United States.

173. Defendants deny the allegations in Paragraph 173 of Plaintiffs' Amended Complaint.

174. Defendants deny the allegations in Paragraph 174 of Plaintiffs' Amended Complaint.

175. Defendants deny the allegations in Paragraph 175 of Plaintiffs' Amended Complaint

176. Defendants lack sufficient information to admit or deny the allegation in Paragraph 176 of Plaintiffs' Amended Complaint and therefore deny same.

177. Defendants deny the allegations in Paragraph 177 of Plaintiffs' Amended Complaint, except state that it submitted visa applications on behalf of said entities.

178. Defendants lack sufficient information to admit or deny the allegation in Paragraph 178 of Plaintiffs' Amended Complaint and therefore deny same.

179. Defendants lack sufficient information to admit or deny the allegations in Paragraph 179 of Plaintiffs' Amended Complaint and therefore deny same.

180. Defendants lack sufficient information to admit or deny the allegations in Paragraph 180 of Plaintiffs' Amended Complaint and therefore deny same.

181. Defendants admit the allegation in Paragraph 181 of Plaintiffs' Amended Complaint, upon information and belief.

182. Defendants admit the allegation in Paragraph 182 of Plaintiffs' Amended Complaint.

183. Defendants admit the allegations in Paragraph 183 of Plaintiffs' Amended Complaint.

184. Defendants lack sufficient information to admit or deny the allegations in Paragraph 184 of Plaintiffs' Amended Complaint and therefore deny same.

185. Paragraph 185 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants lack sufficient information to admit or deny the allegations in Paragraph 185 of Plaintiffs' Amended Complaint and therefore deny same.

186. Defendants deny the allegations in Paragraph 186 of Plaintiffs' Amended Complaint, except state that the subject documents speak for themselves.

187. Paragraph 187 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants lack sufficient information to admit or deny the allegations in Paragraph 187 of Plaintiffs' Amended Complaint and therefore deny same.

188. Paragraph 188 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants lack sufficient information to admit or deny the allegations in Paragraph 188 of Plaintiffs' Amended Complaint and therefore deny same.

**The Alleged February Arrivals: Plaintiffs Ramiro Gonzalez Juarez and Jahir Alfonso Vergara Maza**

189. Defendants lack sufficient information to admit or deny the allegations in Paragraph 189 of Plaintiffs' Amended Complaint and therefore deny same.

190. With respect to Paragraph 190 of Plaintiffs' Amended Complaint, Defendants state that the subject H-2B visa speaks for itself.

191. With respect to Paragraph 191 of Plaintiffs' Amended Complaint, Defendants state that the subject H-2B visa speaks for itself.

192. With respect to Paragraph 192 of Plaintiffs' Amended Complaint, Defendants state that the subject H-2B visa speaks for itself. Defendants deny the remaining allegations in Paragraph 192 of Plaintiffs' Amended Complaint.

193. Defendants lack sufficient information to admit or deny the allegations in Paragraph 193 of Plaintiffs' Amended Complaint and therefore deny same.

194. Defendants lack sufficient information to admit or deny the allegations in Paragraph 194 of Plaintiffs' Amended Complaint and therefore deny same.

195. Defendants lack sufficient information to admit or deny the allegations in Paragraph 195 of Plaintiffs' Amended Complaint and therefore deny same.

196. Defendants deny the allegations in Paragraph 196 of Plaintiffs' Amended Complaint.

197. Defendants deny the allegations in Paragraph 197 of Plaintiffs' Amended Complaint, except state that individuals seeking work in the United States through

Defendant ATJ paid for lodging, travel, and the fee associated with the Application Service Center.

198. Defendants deny the allegations in Paragraph 198 of Plaintiffs' Amended Complaint.

199. Defendants lack sufficient information to admit or deny the allegations in Paragraph 199 of Plaintiffs' Amended Complaint and therefore deny same.

200. Defendants lack sufficient information to admit or deny the allegations in Paragraph 200 of Plaintiffs' Amended Complaint and therefore deny same.

201. Defendants lack sufficient information to admit or deny the allegations in Paragraph 201 of Plaintiffs' Amended Complaint and therefore deny same.

202. Defendants lack sufficient information to admit or deny the allegations in Paragraph 202 of Plaintiffs' Amended Complaint and therefore deny same.

203. Defendants lack sufficient information to admit or deny the allegations in Paragraph 203 of Plaintiffs' Amended Complaint and therefore deny same.

204. Defendants lack sufficient information to admit or deny the allegations in Paragraph 204 of Plaintiffs' Amended Complaint and therefore deny same.

205. Defendants lack sufficient information to admit or deny the allegations in Paragraph 205 of Plaintiffs' Amended Complaint and therefore deny same.

206. Defendants lack sufficient information to admit or deny the allegations in Paragraph 206 of Plaintiffs' Amended Complaint and therefore deny same.

207. Defendants lack sufficient information to admit or deny the allegations in Paragraph 207 of Plaintiffs' Amended Complaint and therefore deny same.

208. Defendants lack sufficient information to admit or deny the allegations in Paragraph 208 of Plaintiffs' Amended Complaint and therefore deny same.

209. Defendants lack sufficient information to admit or deny the allegations in Paragraph 209 of Plaintiffs' Amended Complaint and therefore deny same.

210. Defendants lack sufficient information to admit or deny the allegations in Paragraph 210 of Plaintiffs' Amended Complaint and therefore deny same.

211. Defendants lack sufficient information to admit or deny the allegations in Paragraph 211 of Plaintiffs' Amended Complaint and therefore deny same.

212. Defendants lack sufficient information to admit or deny the allegations in Paragraph 212 of Plaintiffs' Amended Complaint and therefore deny same.

213. Defendants lack sufficient information to admit or deny the allegations in Paragraph 213 of Plaintiffs' Amended Complaint and therefore deny same.

214. Defendants lack sufficient information to admit or deny the allegations in Paragraph 214 of Plaintiffs' Amended Complaint and therefore deny same.

215. Defendants lack sufficient information to admit or deny the allegations in Paragraph 215 of Plaintiffs' Amended Complaint and therefore deny same.

216. Defendants lack sufficient information to admit or deny the allegations in Paragraph 216 of Plaintiffs' Amended Complaint and therefore deny same.

**The Alleged April Arrivals: Plaintiffs Maria del Carmen Mendez Castro, Sara Mendez Castro, Roberto Antonio Cuamba Razo, and Fernando Alarcon Garcia**

217. Defendants lack sufficient information to admit or deny the allegations in Paragraph 217 of Plaintiffs' Amended Complaint and therefore deny same.

218. Defendants admit the allegation in Paragraph 218 of Plaintiffs' Amended Complaint, upon information and belief. Further answering, Defendants state that the cited H-2B visa speaks for itself.

219. With respect to Paragraph 219 of Plaintiffs' Amended Complaint, Defendants state that the cited H-2B visa speaks for itself.

220. Defendants lack sufficient information to admit or deny the allegations in Paragraph 220 of Plaintiffs' Amended Complaint and therefore deny same. Further answering, Defendants state that the cited H-2B visa and petition speak for themselves.

221. Defendants lack sufficient information to admit or deny the allegations in Paragraph 221 of Plaintiffs' Amended Complaint and therefore deny same.

222. Defendants lack sufficient information to admit or deny the allegations in Paragraph 222 of Plaintiffs' Amended Complaint and therefore deny same.

223. Defendants deny the allegation in Paragraph 223 of Plaintiffs' Amended Complaint.

224. Defendants deny the allegation in Paragraph 224 of Plaintiffs' Amended Complaint, upon information and belief.

225. Defendants deny the allegation in Paragraph 225 of Plaintiffs' Amended Complaint.

226. Defendants lack sufficient information to admit or deny the allegations in Paragraph 226 of Plaintiffs' Amended Complaint and therefore deny same.

227. Defendants lack sufficient information to admit or deny the allegations in Paragraph 227 of Plaintiffs' Amended Complaint and therefore deny same.

228. Defendants lack sufficient information to admit or deny the allegations in Paragraph 228 of Plaintiffs' Amended Complaint and therefore deny same.

229. Defendants lack sufficient information to admit or deny the allegations in Paragraph 229 of Plaintiffs' Amended Complaint and therefore deny same.

230. Defendants lack sufficient information to admit or deny the allegations in Paragraph 230 of Plaintiffs' Amended Complaint and therefore deny same.

231. Paragraph 231 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the SOC codes speaks for themselves.

232. Defendants lack sufficient information to admit or deny the allegations in Paragraph 232 of Plaintiffs' Amended Complaint and therefore deny same.

233. Defendants lack sufficient information to admit or deny the allegations in Paragraph 233 of Plaintiffs' Amended Complaint and therefore deny same.

234. Defendants lack sufficient information to admit or deny the allegations in Paragraph 234 of Plaintiffs' Amended Complaint and therefore deny same.

235. Defendants lack sufficient information to admit or deny the allegations in Paragraph 235 of Plaintiffs' Amended Complaint and therefore deny same.

236. Defendants lack sufficient information to admit or deny the allegations in Paragraph 236 of Plaintiffs' Amended Complaint and therefore deny same.

237. Defendants lack sufficient information to admit or deny the allegations in Paragraph 237 of Plaintiffs' Amended Complaint and therefore deny same.

238. Defendants lack sufficient information to admit or deny the allegations in Paragraph 238 of Plaintiffs' Amended Complaint and therefore deny same.

239. Defendants admit the allegation in Paragraph 239 of Plaintiffs' Amended Complaint, upon information and belief. Further answering, Defendants state that the cited H-2B visa speaks for itself.

240. With respect to Paragraph 240 of Plaintiffs' Amended Complaint, Defendants state that the cited H-2B visa speaks for itself.

241. Defendants lack sufficient information to admit or deny the allegations in Paragraph 241 of Plaintiffs' Amended Complaint and therefore deny same. Further answering, Defendants state that the cited H-2B visa and petition speak for themselves.

242. Defendants lack sufficient information to admit or deny the allegations in Paragraph 242 of Plaintiffs' Amended Complaint and therefore deny same.

243. Defendants lack sufficient information to admit or deny the allegations in Paragraph 243 of Plaintiffs' Amended Complaint and therefore deny same.

244. Defendants deny the allegations in Paragraph 244 of Plaintiffs' Amended Complaint.

245. Defendants deny the allegations in Paragraph 245 of Plaintiffs' Amended Complaint, upon information and belief.

246. Defendants deny the allegations in Paragraph 246 of Plaintiffs' Amended Complaint.

247. Defendants lack sufficient information to admit or deny the allegations in Paragraph 247 of Plaintiffs' Amended Complaint and therefore deny same.

248. Defendants lack sufficient information to admit or deny the allegations in Paragraph 248 of Plaintiffs' Amended Complaint and therefore deny same.

249. Defendants lack sufficient information to admit or deny the allegations in Paragraph 249 of Plaintiffs' Amended Complaint and therefore deny same.

250. Defendants lack sufficient information to admit or deny the allegations in Paragraph 250 of Plaintiffs' Amended Complaint and therefore deny same.

251. Defendants lack sufficient information to admit or deny the allegations in Paragraph 251 of Plaintiffs' Amended Complaint and therefore deny same.

252. Defendants lack sufficient information to admit or deny the allegations in Paragraph 252 of Plaintiffs' Amended Complaint and therefore deny same.

253. Defendants lack sufficient information to admit or deny the allegations in Paragraph 253 of Plaintiffs' Amended Complaint and therefore deny same.

254. Defendants lack sufficient information to admit or deny the allegations in Paragraph 254 of Plaintiffs' Amended Complaint and therefore deny same.

255. Defendants admit the allegation in Paragraph 255 of Plaintiffs' Amended Complaint. Further answering, Defendants state that the cited H-2B visa speaks for itself.

256. With respect to Paragraph 256 of Plaintiffs' Amended Complaint, Defendants state that the cited H-2B visa speaks for itself.

257. Defendants lack sufficient information to admit or deny the allegations in Paragraph 257 of Plaintiffs' Amended Complaint and therefore deny same. Further answering, Defendants state that the cited H-2B visa and petition speak for themselves.

258. Defendants lack sufficient information to admit or deny the allegations in Paragraph 258 of Plaintiffs' Amended Complaint and therefore deny same.

259. Defendants deny the allegation in Paragraph 259 of Plaintiffs' Amended Complaint.

260. Defendants lack sufficient information to admit or deny the allegations in Paragraph 260 of Plaintiffs' Amended Complaint and therefore deny same.

261. Defendants lack sufficient information to admit or deny the allegations in Paragraph 261 of Plaintiffs' Amended Complaint and therefore deny same.

262. Defendants deny the allegations in Paragraph 262 of Plaintiffs' Amended Complaint.

263. Defendants lack sufficient information to admit or deny the allegations in Paragraph 263 of Plaintiffs' Amended Complaint and therefore deny same.

264. Defendants lack sufficient information to admit or deny the allegations in Paragraph 264 of Plaintiffs' Amended Complaint and therefore deny same.

265. Defendants lack sufficient information to admit or deny the allegations in Paragraph 265 of Plaintiffs' Amended Complaint and therefore deny same.

266. Defendants lack sufficient information to admit or deny the allegations in Paragraph 266 of Plaintiffs' Amended Complaint and therefore deny same.

267. Defendants lack sufficient information to admit or deny the allegations in Paragraph 267 of Plaintiffs' Amended Complaint and therefore deny same.

268. With respect to Paragraph 268 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

269. With respect to Paragraph 269 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

270. Defendants lack sufficient information to admit or deny the allegations in Paragraph 270 of Plaintiffs' Amended Complaint and therefore deny same.

271. Defendants lack sufficient information to admit or deny the allegations in Paragraph 271 of Plaintiffs' Amended Complaint and therefore deny same.

272. Defendants deny the allegations in Paragraph 272 of Plaintiffs' Amended Complaint.

273. Defendants deny the allegations in Paragraph 273 of Plaintiffs' Amended Complaint, except state that individuals seeking work in the United States through Defendant ATJ paid for lodging, travel, and the fee associated with the Application Service Center.

274. Defendants deny the allegations in Paragraph 274 of Plaintiffs' Amended Complaint.

275. Defendants lack sufficient information to admit or deny the allegations in Paragraph 275 of Plaintiffs' Amended Complaint and therefore deny same.

276. Defendants lack sufficient information to admit or deny the allegations in Paragraph 276 of Plaintiffs' Amended Complaint and therefore deny same.

277. Defendants lack sufficient information to admit or deny the allegations in Paragraph 276 of Plaintiffs' Amended Complaint and therefore deny same.

278. Defendants lack sufficient information to admit or deny the allegations in Paragraph 278 of Plaintiffs' Amended Complaint and therefore deny same.

**The Alleged May Arrivals: Plaintiffs Marco Antonio Olivares Perez, Victor Hugo Medina Tinoco, Rafael Juarez Medrano, Jesus Antonio Perez Villa, Eduardo Sanchez Piñeda, and Fernando Tellez Herrera**

279. Defendants lack sufficient information to admit or deny the allegations in Paragraph 279 of Plaintiffs' Amended Complaint and therefore deny same.

280. Defendants admit the allegation in Paragraph 280 of Plaintiffs' Amended Complaint, upon information and belief. Further answering, Defendants state that the cited H-2B visa speaks for itself.

281. With respect to Paragraph 281 of Plaintiffs' Amended Complaint, Defendants state that the cited H-2B visa speaks for itself.

282. Defendants lack sufficient information to admit or deny the allegations in Paragraph 282 of Plaintiffs' Amended Complaint and therefore deny same. Further answering, Defendants state that the cited H-2B visa and petition speak for themselves.

283. Defendants lack sufficient information to admit or deny the allegations in Paragraph 283 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny that Salvador Mendoza was an agent of Defendant ATJ.

284. Defendants lack sufficient information to admit or deny the allegations in Paragraph 284 of Plaintiffs' Amended Complaint and therefore deny same.

285. Defendants lack sufficient information to admit or deny the allegations in Paragraph 285 of Plaintiffs' Amended Complaint and therefore deny same.

286. Defendants lack sufficient information to admit or deny the allegations in Paragraph 286 of Plaintiffs' Amended Complaint and therefore deny same.

287. Defendants deny the allegation in Paragraph 287 of Plaintiffs' Amended Complaint.

288. Defendants lack sufficient information to admit or deny the allegations in Paragraph 288 of Plaintiffs' Amended Complaint and therefore deny same.

289. Defendants lack sufficient information to admit or deny the allegations in Paragraph 289 of Plaintiffs' Amended Complaint and therefore deny same.

290. Defendants lack sufficient information to admit or deny the allegations in Paragraph 290 of Plaintiffs' Amended Complaint and therefore deny same.

291. With respect to Paragraph 291 of Plaintiffs' Amended Complaint, Defendants state that the cited H-2B visa speaks for itself.

292. With respect to Paragraph 292 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

293. With respect to Paragraph 293 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

294. Defendants lack sufficient information to admit or deny the allegations in Paragraph 294 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny that any person and/or entity served as an agent of Defendants.

295. Defendants lack sufficient information to admit or deny the allegations in Paragraph 295 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny that any person and/or entity served as an agent of Defendants.

296. Defendants lack sufficient information to admit or deny the allegations in Paragraph 296 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny that any person and/or entity served as an agent of Defendants and/or worked or coordinated with Defendant ATJ.

297. Defendants deny the allegations in Paragraph 297 of Plaintiffs' Amended Complaint.

298. Defendants lack sufficient information to admit or deny the allegations in Paragraph 298 of Plaintiffs' Amended Complaint and therefore deny same.

299. Defendants lack sufficient information to admit or deny the allegations in Paragraph 299 of Plaintiffs' Amended Complaint and therefore deny same.

300. Defendants lack sufficient information to admit or deny the allegations in Paragraph 300 of Plaintiffs' Amended Complaint and therefore deny same.

301. Defendants lack sufficient information to admit or deny the allegations in Paragraph 301 of Plaintiffs' Amended Complaint and therefore deny same.

302. With respect to Paragraph 302 of Plaintiffs' Amended Complaint, Defendants state that the cited H-2B visa speaks for itself.

303. With respect to Paragraph 303 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

304. With respect to Paragraph 304 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

305. Defendants lack sufficient information to admit or deny the allegations in Paragraph 305 of Plaintiffs' Amended Complaint and therefore deny same, except

Defendants expressly deny that any person and/or entity served as an agent of Defendants and/or worked with Defendant ATJ.

306. Defendants lack sufficient information to admit or deny the allegations in Paragraph 306 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny that any person and/or entity served as an agent of Defendants and/or worked with Defendant ATJ.

307. Defendants lack sufficient information to admit or deny the allegations in Paragraph 307 of Plaintiffs' Amended Complaint and therefore deny same.

308. Defendants lack sufficient information to admit or deny the allegations in Paragraph 308 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny that any person and/or entity served as an agent of Defendants and/or worked or coordinated with Defendant ATJ.

309. Defendants deny the allegations in Paragraph 309 of Plaintiffs' Amended Complaint and further deny having agents or associates in Mexico.

310. Defendants deny the allegations in Paragraph 310 of Plaintiffs' Amended Complaint, and further deny having agents or associates in Mexico.

311. Defendants lack sufficient information to admit or deny the allegations in Paragraph 311 of Plaintiffs' Complaint and therefore deny same, except Defendants state Plaintiffs generally described the process by which prospective employees would travel to their work locations. Further answering, Defendants expressly deny having any agents outside of Mr. Trevino.

312. Defendants lack sufficient information to admit or deny the allegations in Paragraph 312 of Plaintiffs' Amended Complaint and therefore deny same.

313. Defendants lack sufficient information to admit or deny the allegations in Paragraph 313 of Plaintiffs' Amended Complaint and therefore deny same.

314. Defendants lack sufficient information to admit or deny the allegations in Paragraph 314 of Plaintiffs' Amended Complaint and therefore deny same.

315. Defendants lack sufficient information to admit or deny the allegations in Paragraph 315 of Plaintiffs' Amended Complaint and therefore deny same.

316. Defendants lack sufficient information to admit or deny the allegations in Paragraph 316 of Plaintiffs' Amended Complaint and therefore deny same.

317. Defendants lack sufficient information to admit or deny the allegations in Paragraph 317 of Plaintiffs' Amended Complaint and therefore deny same.

318. Defendants lack sufficient information to admit or deny the allegations in Paragraph 318 of Plaintiffs' Amended Complaint and therefore deny same.

319. With respect to Paragraph 319 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

320. With respect to Paragraph 320 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

321. With respect to Paragraph 321 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

322. Defendants deny the allegations in Paragraph 322 of Plaintiffs' Amended Complaint and further deny having agents or associates in Mexico.

323. Defendants lack sufficient information to admit or deny the allegations in Paragraph 323 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny having agents or associates in Mexico.

324. Defendants lack sufficient information to admit or deny the allegations in Paragraph 324 of Plaintiffs' Amended Complaint and therefore denies same.

325. Defendants lack sufficient information to admit or deny the allegations in Paragraph 325 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny that any person and/or entity served as an agent of Defendants and/or worked or coordinated with Defendant ATJ.

326. Defendants deny the allegations in Paragraph 326 of Plaintiffs' Amended Complaint and further deny having agents or associates in Mexico.

327. Defendants lack sufficient information to admit or deny the allegations in Paragraph 327 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny that any person and/or entity served as an agent of Defendants and/or worked or coordinated with Defendant ATJ.

328. Defendants lack sufficient information to admit or deny the allegations in Paragraph 328 of Plaintiffs' Complaint and therefore deny same, except Defendants state Plaintiffs generally described the process by which prospective employees would travel to their work locations. Further answering, Defendants expressly deny having any agents outside of Mr. Trevino.

329. Defendants lack sufficient information to admit or deny the allegations in Paragraph 329 of Plaintiffs' Amended Complaint and therefore deny same.

330. Defendants lack sufficient information to admit or deny the allegations in Paragraph 330 of Plaintiffs' Amended Complaint and therefore deny same.

331. Defendants lack sufficient information to admit or deny the allegations in Paragraph 331 of Plaintiffs' Amended Complaint and therefore deny same.

332. Defendants lack sufficient information to admit or deny the allegations in Paragraph 332 of Plaintiffs' Amended Complaint and therefore deny same.

333. Defendants lack sufficient information to admit or deny the allegations in Paragraph 333 of Plaintiffs' Amended Complaint and therefore deny same.

334. Defendants lack sufficient information to admit or deny the allegations in Paragraph 334 of Plaintiffs' Amended Complaint and therefore deny same.

335. Defendants lack sufficient information to admit or deny the allegations in Paragraph 335 of Plaintiffs' Amended Complaint and therefore deny same.

336. With respect to Paragraph 336 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

337. With respect to Paragraph 337 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

338. With respect to Paragraph 338 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

339. Defendants lack sufficient information to admit or deny the allegations in Paragraph 339 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny having agents or associates in Mexico.

340. Defendants lack sufficient information to admit or deny the allegations in Paragraph 340 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny having agents or associates in Mexico.

341. Defendants lack sufficient information to admit or deny the allegations in Paragraph 341 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny having agents or associates in Mexico.

342. Defendants lack sufficient information to admit or deny the allegations in Paragraph 342 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny that any person and/or entity served as an agent of Defendants and/or worked or coordinated with Defendant ATJ.

343. Defendants deny the allegations in Paragraph 343 of Plaintiffs' Amended Complaint and further deny having agents or associates in Mexico.

344. Defendants lack sufficient information to admit or deny the allegations in Paragraph 344 of Plaintiffs' Amended Complaint and further deny having agents or associates in Mexico.

345. Defendants lack sufficient information to admit or deny the allegations in Paragraph 345 of Plaintiffs' Complaint and therefore deny same, except Defendants state Plaintiffs generally described the process by which prospective employees would travel to their work locations. Further answering, Defendants expressly deny having any agents outside of Mr. Trevino.

346. Defendants lack sufficient information to admit or deny the allegations in Paragraph 346 of Plaintiffs' Amended Complaint and therefore deny same.

347. Defendants lack sufficient information to admit or deny the allegations in Paragraph 347 of Plaintiffs' Amended Complaint and therefore deny same

348. Defendants lack sufficient information to admit or deny the allegations in Paragraph 348 of Plaintiffs' Amended Complaint and therefore deny same

349. Defendants lack sufficient information to admit or deny the allegations in Paragraph 349 of Plaintiffs' Amended Complaint and therefore deny same

350. Defendants lack sufficient information to admit or deny the allegations in Paragraph 350 of Plaintiffs' Amended Complaint and therefore deny same

351. Defendants lack sufficient information to admit or deny the allegations in Paragraph 351 of Plaintiffs' Amended Complaint and therefore deny same

352. Defendants lack sufficient information to admit or deny the allegations in Paragraph 352 of Plaintiffs' Amended Complaint and therefore deny same

353. With respect to Paragraph 353 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

354. With respect to Paragraph 354 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

355. With respect to Paragraph 355 of Plaintiffs' Amended Complaint, Defendants state that the cited visa speaks for itself.

356. Defendants lack sufficient information to admit or deny the allegations in Paragraph 356 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny having agents or associates in Mexico.

357. Defendants lack sufficient information to admit or deny the allegations in Paragraph 357 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny having agents or associates in Mexico.

358. Defendants lack sufficient information to admit or deny the allegations in Paragraph 358 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny having agents or associates in Mexico.

359. Defendants lack sufficient information to admit or deny the allegations in Paragraph 359 of Plaintiffs' Amended Complaint and therefore deny same, except Defendants expressly deny that any person and/or entity served as an agent of Defendants and/or worked or coordinated with Defendant ATJ.

360. Defendants deny the allegations in Paragraph 360 of Plaintiffs' Amended Complaint and further deny having agents or associates in Mexico.

361. Defendants lack sufficient information to admit or deny the allegations in Paragraph 361 of Plaintiffs' Amended Complaint and further deny having agents or associates in Mexico.

362. Defendants lack sufficient information to admit or deny the allegations in Paragraph 362 of Plaintiffs' Complaint and therefore deny same, except Defendants state Plaintiffs generally described the process by which prospective employees would travel to their work locations. Further answering, Defendants expressly deny having any agents outside of Mr. Trevino.

363. Defendants lack sufficient information to admit or deny the allegations in Paragraph 363 of Plaintiffs' Amended Complaint and therefore deny same.

364. Defendants lack sufficient information to admit or deny the allegations in Paragraph 364 of Plaintiffs' Amended Complaint and therefore deny same.

365. Defendants lack sufficient information to admit or deny the allegations in Paragraph 365 of Plaintiffs' Amended Complaint and therefore deny same.

366. Defendants lack sufficient information to admit or deny the allegations in Paragraph 366 of Plaintiffs' Amended Complaint and therefore deny same.

367. Defendants lack sufficient information to admit or deny the allegations in Paragraph 367 of Plaintiffs' Amended Complaint and therefore deny same.

368. Defendants lack sufficient information to admit or deny the allegations in Paragraph 368 of Plaintiffs' Amended Complaint and therefore deny same.

369. Defendants lack sufficient information to admit or deny the allegations in Paragraph 369 of Plaintiffs' Amended Complaint and therefore deny same.

370. Defendants lack sufficient information to admit or deny the allegations in Paragraph 370 of Plaintiffs' Amended Complaint and therefore deny same.

371. With respect to Paragraph 371 of Plaintiffs' Amended Complaint, Defendants state that the referenced visas speak for themselves.

372. Defendants lack sufficient information to admit or deny the allegations in Paragraph 372 of Plaintiffs' Amended Complaint and therefore deny same.

373. Defendants lack sufficient information to admit or deny the allegations in Paragraph 373 of Plaintiffs' Amended Complaint and therefore deny same.

374. Defendants lack sufficient information to admit or deny the allegations in Paragraph 374 of Plaintiffs' Amended Complaint and therefore deny same.

375. Defendants lack sufficient information to admit or deny the allegations in Paragraph 375 of Plaintiffs' Amended Complaint and therefore deny same.

376. Defendants lack sufficient information to admit or deny the allegations in Paragraph 376 of Plaintiffs' Amended Complaint and therefore deny same.

377. Defendants deny the allegations in Paragraph 377 of Plaintiffs' Amended Complaint.

378. Defendants deny the allegations in Paragraph 378 of Plaintiffs' Amended Complaint, upon information and belief.

379. Defendants deny the allegation in Paragraph 379 of Plaintiffs' Amended Complaint.

380. Defendants lack sufficient information to admit or deny the allegations in Paragraph 380 of Plaintiffs' Amended Complaint and therefore deny same.

381. Defendants lack sufficient information to admit or deny the allegations in Paragraph 381 of Plaintiffs' Amended Complaint and therefore deny same.

382. Defendants lack sufficient information to admit or deny the allegations in Paragraph 382 of Plaintiffs' Amended Complaint and therefore deny same.

383. Defendants lack sufficient information to admit or deny the allegations in Paragraph 383 of Plaintiffs' Amended Complaint and therefore deny same.

384. Defendants lack sufficient information to admit or deny the allegations in Paragraph 384 of Plaintiffs' Amended Complaint and therefore deny same.

385. Defendants lack sufficient information to admit or deny the allegations in Paragraph 385 of Plaintiffs' Amended Complaint and therefore deny same.

**Defendant Midwest's Alleged Failure to Pay Wages**

386. Defendants lack sufficient information to admit or deny the allegations in Paragraph 386 of Plaintiffs' Amended Complaint and therefore deny same.

387. Defendants lack sufficient information to admit or deny the allegations in Paragraph 387 of Plaintiffs' Amended Complaint and therefore deny same.

388. Defendants lack sufficient information to admit or deny the allegations in Paragraph 388 of Plaintiffs' Amended Complaint and therefore deny same.

389. Defendants lack sufficient information to admit or deny the allegations in Paragraph 389 of Plaintiffs' Amended Complaint and therefore deny same.

390. Defendants lack sufficient information to admit or deny the allegations in Paragraph 390 of Plaintiffs' Amended Complaint and therefore deny same.

391. Defendants lack sufficient information to admit or deny the allegations in Paragraph 391 of Plaintiffs' Amended Complaint and therefore deny same.

392. Defendants lack sufficient information to admit or deny the allegations in Paragraph 392 of Plaintiffs' Amended Complaint and therefore deny same.

393. Defendants lack sufficient information to admit or deny the allegations in Paragraph 393 of Plaintiffs' Amended Complaint and therefore deny same.

394. Defendants lack sufficient information to admit or deny the allegations in Paragraph 394 of Plaintiffs' Amended Complaint and therefore deny same.

395. Defendants lack sufficient information to admit or deny the allegations in Paragraph 395 of Plaintiffs' Amended Complaint and therefore deny same.

396. Defendants lack sufficient information to admit or deny the allegations in Paragraph 396 of Plaintiffs' Amended Complaint and therefore deny same.

397. Defendants lack sufficient information to admit or deny the allegations in Paragraph 397 of Plaintiffs' Amended Complaint and therefore deny same.

398. Defendants lack sufficient information to admit or deny the allegations in Paragraph 398 of Plaintiffs' Amended Complaint and therefore deny same.

399. Defendants lack sufficient information to admit or deny the allegations in Paragraph 399 of Plaintiffs' Amended Complaint and therefore deny same.

400. Defendants lack sufficient information to admit or deny the allegations in Paragraph 400 of Plaintiffs' Amended Complaint and therefore deny same.

401. Defendants lack sufficient information to admit or deny the allegations in Paragraph 401 of Plaintiffs' Amended Complaint and therefore deny same.

402. Defendants lack sufficient information to admit or deny the allegations in Paragraph 402 of Plaintiffs' Amended Complaint and therefore deny same.

403. Defendants lack sufficient information to admit or deny the allegations in Paragraph 403 of Plaintiffs' Amended Complaint and therefore deny same.

404. Defendants lack sufficient information to admit or deny the allegations in Paragraph 404 of Plaintiffs' Amended Complaint and therefore deny same.

405. Defendants lack sufficient information to admit or deny the allegations in Paragraph 405 of Plaintiffs' Amended Complaint and therefore deny same.

406. Defendants lack sufficient information to admit or deny the allegations in Paragraph 406 of Plaintiffs' Amended Complaint and therefore deny same.

407. Defendants lack sufficient information to admit or deny the allegations in Paragraph 407 of Plaintiffs' Amended Complaint and therefore deny same.

408. Defendants lack sufficient information to admit or deny the allegations in Paragraph 408 of Plaintiffs' Amended Complaint and therefore deny same.

409. Defendants lack sufficient information to admit or deny the allegations in Paragraph 409 of Plaintiffs' Amended Complaint and therefore deny same.

410. Defendants lack sufficient information to admit or deny the allegations in Paragraph 410 of Plaintiffs' Amended Complaint and therefore deny same.

411. Defendants lack sufficient information to admit or deny the allegations in Paragraph 411 of Plaintiffs' Amended Complaint and therefore deny same.

412. Defendants lack sufficient information to admit or deny the allegations in Paragraph 412 of Plaintiffs' Amended Complaint and therefore deny same.

### **Plaintiffs' Allegations That They Suffered Abusive Treatment and Working Conditions**

413. Defendants lack sufficient information to admit or deny the allegations in Paragraph 413 of Plaintiffs' Amended Complaint and therefore deny same.

414. Defendants lack sufficient information to admit or deny the allegations in Paragraph 414 of Plaintiffs' Amended Complaint and therefore deny same.

415. Defendants lack sufficient information to admit or deny the allegations in Paragraph 415 of Plaintiffs' Amended Complaint and therefore deny same.

416. Defendants lack sufficient information to admit or deny the allegations in Paragraph 416 of Plaintiffs' Amended Complaint and therefore deny same.

417. Defendants lack sufficient information to admit or deny the allegations in Paragraph 417 of Plaintiffs' Amended Complaint and therefore deny same.

418. Defendants lack sufficient information to admit or deny the allegations in Paragraph 418 of Plaintiffs' Amended Complaint and therefore deny same.

419. Defendants lack sufficient information to admit or deny the allegations in Paragraph 419 of Plaintiffs' Amended Complaint and therefore deny same.

420. Defendants lack sufficient information to admit or deny the allegations in Paragraph 420 of Plaintiffs' Amended Complaint and therefore deny same.

421. Defendants lack sufficient information to admit or deny the allegations in Paragraph 421 of Plaintiffs' Amended Complaint and therefore deny same.

422. Defendants lack sufficient information to admit or deny the allegations in Paragraph 422 of Plaintiffs' Amended Complaint and therefore deny same.

423. Defendants lack sufficient information to admit or deny the allegations in Paragraph 423 of Plaintiffs' Amended Complaint and therefore deny same.

424. Defendants lack sufficient information to admit or deny the allegations in Paragraph 424 of Plaintiffs' Amended Complaint and therefore deny same.

425. Defendants lack sufficient information to admit or deny the allegations in Paragraph 425 of Plaintiffs' Amended Complaint and therefore deny same.

426. Defendants lack sufficient information to admit or deny the allegations in Paragraph 426 of Plaintiffs' Amended Complaint and therefore deny same.

427. Paragraph 427 of Plaintiffs' Amended Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants lack

sufficient information to admit or deny the allegations in Paragraph 427 of Plaintiffs' Amended Complaint and therefore deny same.

428. Defendants lack sufficient information to admit or deny the allegations in Paragraph 428 of Plaintiffs' Amended Complaint and therefore deny same.

429. Defendants lack sufficient information to admit or deny the allegations in Paragraph 429 of Plaintiffs' Amended Complaint and therefore deny same.

430. Defendants lack sufficient information to admit or deny the allegations in Paragraph 430 of Plaintiffs' Amended Complaint and therefore deny same.

431. Defendants lack sufficient information to admit or deny the allegations in Paragraph 431 of Plaintiffs' Amended Complaint and therefore deny same.

432. Defendants lack sufficient information to admit or deny the allegations in Paragraph 432 of Plaintiffs' Amended Complaint and therefore deny same.

433. Defendants lack sufficient information to admit or deny the allegations in Paragraph 433 of Plaintiffs' Amended Complaint and therefore deny same.

434. Defendants lack sufficient information to admit or deny the allegations in Paragraph 434 of Plaintiffs' Amended Complaint and therefore deny same.

435. Defendants lack sufficient information to admit or deny the allegations in Paragraph 435 of Plaintiffs' Amended Complaint and therefore deny same.

436. Defendants lack sufficient information to admit or deny the allegations in Paragraph 436 of Plaintiffs' Amended Complaint and therefore deny same.

437. Defendants lack sufficient information to admit or deny the allegations in Paragraph 437 of Plaintiffs' Amended Complaint and therefore deny same.

438. Defendants lack sufficient information to admit or deny the allegations in Paragraph 438 of Plaintiffs' Amended Complaint and therefore deny same.

439. Defendants lack sufficient information to admit or deny the allegations in Paragraph 439 of Plaintiffs' Amended Complaint and therefore deny same.

440. Defendants lack sufficient information to admit or deny the allegations in Paragraph 440 of Plaintiffs' Amended Complaint and therefore deny same.

441. Defendants lack sufficient information to admit or deny the allegations in Paragraph 441 of Plaintiffs' Amended Complaint and therefore deny same.

442. Defendants lack sufficient information to admit or deny the allegations in Paragraph 442 of Plaintiffs' Amended Complaint and therefore deny same.

443. Defendants lack sufficient information to admit or deny the allegations in Paragraph 443 of Plaintiffs' Amended Complaint and therefore deny same.

444. Defendants lack sufficient information to admit or deny the allegations in Paragraph 444 of Plaintiffs' Amended Complaint and therefore deny same.

445. Defendants lack sufficient information to admit or deny the allegations in Paragraph 445 of Plaintiffs' Amended Complaint and therefore deny same.

446. Defendants lack sufficient information to admit or deny the allegations in Paragraph 446 of Plaintiffs' Amended Complaint and therefore deny same.

447. Defendants lack sufficient information to admit or deny the allegations in Paragraph 447 of Plaintiffs' Amended Complaint and therefore deny same.

448. Defendants lack sufficient information to admit or deny the allegations in Paragraph 448 of Plaintiffs' Amended Complaint and therefore deny same.

449. Defendants lack sufficient information to admit or deny the allegations in Paragraph 449 of Plaintiffs' Amended Complaint and therefore deny same.

450. Defendants lack sufficient information to admit or deny the allegations in Paragraph 450 of Plaintiffs' Amended Complaint and therefore deny same.

451. Defendants lack sufficient information to admit or deny the allegations in Paragraph 451 of Plaintiffs' Amended Complaint and therefore deny same.

452. Defendants lack sufficient information to admit or deny the allegations in Paragraph 452 of Plaintiffs' Amended Complaint and therefore deny same.

453. Defendants lack sufficient information to admit or deny the allegations in Paragraph 453 of Plaintiffs' Amended Complaint and therefore deny same.

454. Defendants lack sufficient information to admit or deny the allegations in Paragraph 454 of Plaintiffs' Amended Complaint and therefore deny same.

455. Defendants lack sufficient information to admit or deny the allegations in Paragraph 455 of Plaintiffs' Amended Complaint and therefore deny same.

456. Defendants lack sufficient information to admit or deny the allegations in Paragraph 456 of Plaintiffs' Amended Complaint and therefore deny same.

457. Defendants lack sufficient information to admit or deny the allegations in Paragraph 457 of Plaintiffs' Amended Complaint and therefore deny same.

458. With respect to Paragraph 458 of Plaintiffs' Amended Complaint, Defendants state that the Spanish-to-English translation of the referenced words speaks for itself.

459. With respect to Paragraph 459 of Plaintiffs' Amended Complaint, Defendants state that the Spanish-to-English translation of the referenced words speaks for itself.

460. Defendants lack sufficient information to admit or deny the allegations in Paragraph 460 of Plaintiffs' Amended Complaint and therefore deny same.

461. With respect to Paragraph 461 of Plaintiffs' Amended Complaint, Defendants state that the Spanish-to-English translation of the referenced words speaks for itself.

462. Defendants lack sufficient information to admit or deny the allegations in Paragraph 462 of Plaintiffs' Amended Complaint and therefore deny same.

463. Defendants lack sufficient information to admit or deny the allegations in Paragraph 463 of Plaintiffs' Amended Complaint and therefore deny same.

464. Defendants lack sufficient information to admit or deny the allegations in Paragraph 464 of Plaintiffs' Amended Complaint and therefore deny same.

465. Defendants lack sufficient information to admit or deny the allegations in Paragraph 465 of Plaintiffs' Amended Complaint and therefore deny same.

466. Defendants lack sufficient information to admit or deny the allegations in Paragraph 466 of Plaintiffs' Amended Complaint and therefore deny same.

467. Defendants lack sufficient information to admit or deny the allegations in Paragraph 467 of Plaintiffs' Amended Complaint and therefore deny same.

468. Defendants lack sufficient information to admit or deny the allegations in Paragraph 468 of Plaintiffs' Amended Complaint and therefore deny same.

469. Defendants lack sufficient information to admit or deny the allegations in Paragraph 469 of Plaintiffs' Amended Complaint and therefore deny same.

470. Defendants lack sufficient information to admit or deny the allegations in Paragraph 470 of Plaintiffs' Amended Complaint and therefore deny same.

471. Defendants lack sufficient information to admit or deny the allegations in Paragraph 471 of Plaintiffs' Amended Complaint and therefore deny same.

472. Defendants lack sufficient information to admit or deny the allegations in Paragraph 472 of Plaintiffs' Amended Complaint and therefore deny same.

473. Defendants lack sufficient information to admit or deny the allegations in Paragraph 473 of Plaintiffs' Amended Complaint and therefore deny same.

474. Defendants lack sufficient information to admit or deny the allegations in Paragraph 474 of Plaintiffs' Amended Complaint and therefore deny same.

**Defendant Midwest's Alleged Termination of Plaintiffs Roberto Antonio Cuamba Razo, Marco Antonio Olivares Perez, Fernando Alarcon Garcia, and Victor Hugo Medina Tinoco Following the Escape of Plaintiffs Eduardo Sanchez Piñeda, Rafael Juarez Medrano, Jesus Antonio Perez Villa, and Fernando Tellez Herrera in June 2015**

475. Defendants lack sufficient information to admit or deny the allegations in Paragraph 475 of Plaintiffs' Amended Complaint and therefore deny same.

476. Defendants lack sufficient information to admit or deny the allegations in Paragraph 476 of Plaintiffs' Amended Complaint and therefore deny same.

477. Defendants lack sufficient information to admit or deny the allegations in Paragraph 477 of Plaintiffs' Amended Complaint and therefore deny same.

478. Defendants lack sufficient information to admit or deny the allegations in Paragraph 478 of Plaintiffs' Amended Complaint and therefore deny same.

479. Defendants lack sufficient information to admit or deny the allegations in Paragraph 479 of Plaintiffs' Amended Complaint and therefore deny same.

480. Defendants lack sufficient information to admit or deny the allegations in Paragraph 480 of Plaintiffs' Amended Complaint and therefore deny same.

481. Defendants lack sufficient information to admit or deny the allegations in Paragraph 481 of Plaintiffs' Amended Complaint and therefore deny same.

482. Defendants lack sufficient information to admit or deny the allegations in Paragraph 482 and therefore deny same.

483. Defendants lack sufficient information to admit or deny the allegations in Paragraph 483 and therefore deny same.

484. Defendants lack sufficient information to admit or deny the allegations in Paragraph 484 and therefore deny same.

485. Defendants lack sufficient information to admit or deny the allegations in Paragraph 485 and therefore deny same.

486. Defendants lack sufficient information to admit or deny the allegations in Paragraph 486 and therefore deny same.

487. Defendants lack sufficient information to admit or deny the allegations in Paragraph 487 and therefore deny same.

488. Defendants lack sufficient information to admit or deny the allegations in Paragraph 488 and therefore deny same.

489. Defendants lack sufficient information to admit or deny the allegations in Paragraph 489 and therefore deny same.

490. Defendants lack sufficient information to admit or deny the allegations in Paragraph 490 and therefore deny same, except Defendants expressly deny that Salvador Mendoza was an agent of Defendant ATJ.

491. Defendants lack sufficient information to admit or deny the allegations in Paragraph 491 and therefore deny same.

492. Defendants lack sufficient information to admit or deny the allegations in Paragraph 492 and therefore deny same.

**Remaining Plaintiffs' Alleged Exodus from Defendant Midwest on August 15, 2015**

493. Defendants lack sufficient information to admit or deny the allegations in Paragraph 493 of Plaintiffs' Amended Complaint and therefore deny same.

494. Defendants lack sufficient information to admit or deny the allegations in Paragraph 494 of Plaintiffs' Amended Complaint and therefore deny same.

495. Defendants lack sufficient information to admit or deny the allegations in Paragraph 495 of Plaintiffs' Amended Complaint and therefore deny same.

496. Defendants lack sufficient information to admit or deny the allegations in Paragraph 496 of Plaintiffs' Amended Complaint and therefore deny same.

497. Defendants lack sufficient information to admit or deny the allegations in Paragraph 497 of Plaintiffs' Amended Complaint and therefore deny same.

498. Defendants lack sufficient information to admit or deny the allegations in Paragraph 498 of Plaintiffs' Amended Complaint and therefore deny same.

499. Defendants lack sufficient information to admit or deny the allegations in Paragraph 499 of Plaintiffs' Amended Complaint and therefore deny same.

500. Defendants lack sufficient information to admit or deny the allegations in Paragraph 500 of Plaintiffs' Amended Complaint and therefore deny same.

501. Defendants lack sufficient information to admit or deny the allegations in Paragraph 501 of Plaintiffs' Amended Complaint and therefore deny same.

502. Defendants lack sufficient information to admit or deny the allegations in Paragraph 502 of Plaintiffs' Amended Complaint and therefore deny same.

503. Defendants lack sufficient information to admit or deny the allegations in Paragraph 503 of Plaintiffs' Amended Complaint and therefore deny same.

504. Defendants lack sufficient information to admit or deny the allegations in Paragraph 504 of Plaintiffs' Amended Complaint and therefore deny same.

505. Defendants lack sufficient information to admit or deny the allegations in Paragraph 505 of Plaintiffs' Amended Complaint and therefore deny same.

506. Defendants lack sufficient information to admit or deny the allegations in Paragraph 506 of Plaintiffs' Amended Complaint and therefore deny same.

507. Defendants lack sufficient information to admit or deny the allegations in Paragraph 507 of Plaintiffs' Amended Complaint and therefore deny same.

508. Defendants lack sufficient information to admit or deny the allegations in Paragraph 508 of Plaintiffs' Amended Complaint and therefore deny same.

509. Defendants lack sufficient information to admit or deny the allegations in Paragraph 509 of Plaintiffs' Amended Complaint and therefore deny same.

510. Defendants lack sufficient information to admit or deny the allegations in Paragraph 510 of Plaintiffs' Amended Complaint and therefore deny same.

511. Defendants lack sufficient information to admit or deny the allegations in Paragraph 511 of Plaintiffs' Amended Complaint and therefore deny same.

512. Defendants lack sufficient information to admit or deny the allegations in Paragraph 512 of Plaintiffs' Amended Complaint and therefore deny same.

**FIRST CLAIM FOR RELIEF**  
**FEDERAL FAIR LABOR STANDARDS ACT ("FLSA")**  
**29 U.S.C. § 203 ET SEQ. (2015)**

513. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

514. With respect to Paragraph 514 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 514 of Plaintiffs' Amended Complaint.

515. With respect to Paragraph 515 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 515 of Plaintiffs' Amended Complaint.

516. With respect to Paragraph 516 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 516 of Plaintiffs' Amended Complaint.

517. With respect to Paragraph 517 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 517 of Plaintiffs' Amended Complaint.

518. With respect to Paragraph 518 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 518 of Plaintiffs' Amended Complaint.

519. With respect to Paragraph 519 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 519 of Plaintiffs' Amended Complaint.

520. With respect to Paragraph 520 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 520 of Plaintiffs' Amended Complaint.

521. With respect to Paragraph 521 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 521 of Plaintiffs' Amended Complaint.

522. With respect to Paragraph 522 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 522 of Plaintiffs' Amended Complaint.

523. With respect to Paragraph 523 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 523 of Plaintiffs' Amended Complaint.

524. With respect to Paragraph 524 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 524 of Plaintiffs' Amended Complaint.

525. With respect to Paragraph 525 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 525 of Plaintiffs' Amended Complaint.

526. With respect to Paragraph 526 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 526 of Plaintiffs' Amended Complaint.

527. With respect to Paragraph 527 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 527 of Plaintiffs' Amended Complaint.

528. With respect to Paragraph 528 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 528 of Plaintiffs' Amended Complaint.

529. With respect to Paragraph 529 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 529 of Plaintiffs' Amended Complaint.

530. With respect to Paragraph 530 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 530 of Plaintiffs' Amended Complaint.

531. With respect to Paragraph 531 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 531 of Plaintiffs' Amended Complaint.

532. With respect to Paragraph 532 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 532 of Plaintiffs' Amended Complaint.

533. With respect to Paragraph 533 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 533 of Plaintiffs' Amended Complaint.

534. With respect to Paragraph 534 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 534 of Plaintiffs' Amended Complaint.

535. With respect to Paragraph 535 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 535 of Plaintiffs' Amended Complaint.

**SECOND CLAIM FOR RELIEF**  
**MINNESOTA FAIR LABOR STANDARDS ACT**  
**Wage Claims, Minn. Stat. § 177 et seq. (2015)**

536. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

537. With respect to Paragraph 537 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 537 of Plaintiffs' Amended Complaint.

538. With respect to Paragraph 538 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 538 of Plaintiffs' Amended Complaint.

539. With respect to Paragraph 539 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 539 of Plaintiffs' Amended Complaint.

540. With respect to Paragraph 540 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 540 of Plaintiffs' Amended Complaint.

541. With respect to Paragraph 541 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 541 of Plaintiffs' Amended Complaint.

542. With respect to Paragraph 542 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 542 of Plaintiffs' Amended Complaint.

543. With respect to Paragraph 543 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 543 of Plaintiffs' Amended Complaint.

544. With respect to Paragraph 544 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 544 of Plaintiffs' Amended Complaint.

545. With respect to Paragraph 545 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 545 of Plaintiffs' Amended Complaint.

546. With respect to Paragraph 546 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 546 of Plaintiffs' Amended Complaint.

547. With respect to Paragraph 547 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 547 of Plaintiffs' Amended Complaint.

548. With respect to Paragraph 548 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 548 of Plaintiffs' Amended Complaint.

549. With respect to Paragraph 549 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 549 of Plaintiffs' Amended Complaint.

550. With respect to Paragraph 550 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 550 of Plaintiffs' Amended Complaint.

551. With respect to Paragraph 551 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 551 of Plaintiffs' Amended Complaint.

**THIRD CLAIM FOR RELIEF**  
**MINNESOTA FAIR LABOR STANDARDS ACT**  
**Working Conditions, Minn. Stat. § 177 et seq. (2015)**

552. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

553. With respect to Paragraph 553 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 553 of Plaintiffs' Amended Complaint.

554. With respect to Paragraph 554 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 554 of Plaintiffs' Amended Complaint.

555. With respect to Paragraph 555 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 555 of Plaintiffs' Amended Complaint.

556. With respect to Paragraph 556 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 556 of Plaintiffs' Amended Complaint.

557. With respect to Paragraph 557 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 557 of Plaintiffs' Amended Complaint.

558. With respect to Paragraph 558 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 558 of Plaintiffs' Amended Complaint.

559. With respect to Paragraph 559 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 559 of Plaintiffs' Amended Complaint.

**FOURTH CLAIM FOR RELIEF**  
**MINNESOTA WAGE PAYMENT**  
**Minn. Stat. § 181 et seq. (2015)**

560. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

561. With respect to Paragraph 561 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 561 of Plaintiffs' Amended Complaint.

562. With respect to Paragraph 562 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 562 of Plaintiffs' Amended Complaint.

563. With respect to Paragraph 563 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 563 of Plaintiffs' Amended Complaint.

564. With respect to Paragraph 564 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 564 of Plaintiffs' Amended Complaint.

565. With respect to Paragraph 565 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 565 of Plaintiffs' Amended Complaint.

566. With respect to Paragraph 566 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 566 of Plaintiffs' Amended Complaint.

567. With respect to Paragraph 567 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 567 of Plaintiffs' Amended Complaint.

**FIFTH CLAIM FOR RELIEF**  
**MINNESOTA WAGE PAYMENT ACT**  
**False Statements as Inducement to Entering Employment**  
**Minn. Stat. §§ 181.64, 181.65 (2015)**

568. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

569. Paragraph 569 of Plaintiffs' Amended Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 569 of Plaintiffs' Amended Complaint.

570. Paragraph 570 of Plaintiffs' Amended Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 570 of Plaintiffs' Amended Complaint.

571. Defendants deny the allegations in Paragraph 571 of Plaintiffs' Amended Complaint.

572. Defendants deny the allegations in Paragraph 572 of Plaintiffs' Amended Complaint.

573. Defendants deny the allegations in Paragraph 573 of Plaintiffs' Amended Complaint.

574. Defendants deny the allegations in Paragraph 574 of Plaintiffs' Amended Complaint.

**SIXTH CLAIM FOR RELIEF**  
**TRAFFICKING VICTIMS PROTECTION ACT (TVPRA)**  
**Forced Labor, 18 U.S.C. § 1589 (2015)**

575. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

576. With respect to Paragraph 576 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 576 of Plaintiffs' Amended Complaint.

577. With respect to Paragraph 577 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 577 of Plaintiffs' Amended Complaint.

578. With respect to Paragraph 578 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 578 of Plaintiffs' Amended Complaint.

579. With respect to Paragraph 579 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 579 of Plaintiffs' Amended Complaint.

580. With respect to Paragraph 580 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 580 of Plaintiffs' Amended Complaint.

581. With respect to Paragraph 581 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 581 of Plaintiffs' Amended Complaint.

582. With respect to Paragraph 582 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 582 of Plaintiffs' Amended Complaint.

583. With respect to Paragraph 583 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 583 of Plaintiffs' Amended Complaint.

584. With respect to Paragraph 584 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 584 of Plaintiffs' Amended Complaint.

585. With respect to Paragraph 585 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 585 of Plaintiffs' Amended Complaint.

586. With respect to Paragraph 586 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 586 of Plaintiffs' Amended Complaint.

**SEVENTH CLAIM FOR RELIEF**  
**TVPRA**  
**Human Trafficking 18 U.S.C. § 1590 (2015)**

587. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

588. Paragraph 588 of Plaintiffs' Amended Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 588 of Plaintiffs' Amended Complaint.

589. Paragraph 589 of Plaintiffs' Amended Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 589 of Plaintiffs' Amended Complaint.

590. Defendants deny the allegations in Paragraph 590 of Plaintiffs' Amended Complaint.

591. Defendants deny the allegations in Paragraph 591 of Plaintiffs' Amended Complaint.

592. Defendants deny the allegations in Paragraph 592 of Plaintiffs' Amended Complaint.

593. Defendants deny the allegations in Paragraph 593 of Plaintiffs' Amended Complaint.

594. Defendants deny the allegations in Paragraph 594 of Plaintiffs' Amended Complaint.

595. Defendants deny the allegations in Paragraph 595 of Plaintiffs' Amended Complaint.

**EIGHTH CLAIM FOR RELIEF**  
**MINNESOTA LABOR TRAFFICKING CRIMES**  
**Minn. Stat. § 609.281 et seq. (2015)**

596. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

597. Paragraph 597 of Plaintiffs' Amended Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 597 of Plaintiffs' Amended Complaint.

598. Paragraph 598 of Plaintiffs' Amended Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 598 of Plaintiffs' Amended Complaint.

599. Defendants deny the allegations in Paragraph 599 of Plaintiffs' Amended Complaint.

600. Defendants deny the allegations in Paragraph 600 of Plaintiffs' Amended Complaint.

601. Defendants deny the allegations in Paragraph 601 of Plaintiffs' Amended Complaint.

602. Defendants deny the allegations in Paragraph 602 of Plaintiffs' Amended Complaint.

603. Defendants deny the allegations in Paragraph 603 of Plaintiffs' Amended Complaint.

604. Defendants deny the allegations in Paragraph 604 of Plaintiffs' Amended Complaint.

605. Defendants deny the allegations in Paragraph 605 of Plaintiffs' Amended Complaint.

606. Defendants deny the allegations in Paragraph 606 of Plaintiffs' Amended Complaint.

607. Defendants deny the allegations in Paragraph 607 of Plaintiffs' Amended Complaint.

608. Defendants deny the allegations in Paragraph 608 of Plaintiffs' Amended Complaint.

609. Defendants deny the allegations in Paragraph 609 of Plaintiffs' Amended Complaint.

**NINTH CLAIM FOR RELIEF**  
**ALIEN TORT CLAIMS ACT, 28 U.S.C. § 1330**  
**Involuntary Servitude and Forced Labor**

610. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

611. Paragraph 611 of Plaintiffs' Amended Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 611 of Plaintiffs' Amended Complaint.

612. Defendants deny the allegations in Paragraph 612 of Plaintiffs' Amended Complaint.

613. Defendants deny the allegations in Paragraph 613 of Plaintiffs' Amended Complaint.

614. Defendants deny the allegations in Paragraph 614 of Plaintiffs' Amended Complaint.

615. Defendants deny the allegations in Paragraph 615 of Plaintiffs' Amended Complaint.

616. Defendants deny the allegations in Paragraph 616 of Plaintiffs' Amended Complaint.

617. Defendants deny the allegations in Paragraph 617 of Plaintiffs' Amended Complaint.

618. Defendants deny the allegations in Paragraph 618 of Plaintiffs' Amended Complaint.

619. Defendants deny the allegations in Paragraph 619 of Plaintiffs' Amended Complaint.

620. Defendants deny the allegations in Paragraph 620 of Plaintiffs' Amended Complaint.

621. Defendants deny the allegations in Paragraph 621 of Plaintiffs' Amended Complaint.

**TENTH CLAIM FOR RELIEF**  
**ALIEN TORT CLAIMS ACT, 28 U.S.C. § 1330)**  
**Human Trafficking**

622. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

623. Paragraph 623 of Plaintiffs' Amended Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 623 of Plaintiffs' Amended Complaint.

624. Defendants deny the allegations in Paragraph 624 of Plaintiffs' Amended Complaint.

625. Defendants deny the allegations in Paragraph 625 of Plaintiffs' Amended Complaint.

626. Defendants deny the allegations in Paragraph 626 of Plaintiffs' Amended Complaint.

627. Defendants deny the allegations in Paragraph 627 of Plaintiffs' Amended Complaint.

628. Defendants deny the allegations in Paragraph 628 of Plaintiffs' Amended Complaint.

629. Defendants deny the allegations in Paragraph 629 of Plaintiffs' Amended Complaint.

630. Defendants deny the allegations in Paragraph 630 of Plaintiffs' Amended Complaint.

631. Defendants deny the allegations in Paragraph 631 of Plaintiffs' Amended Complaint.

632. Defendants deny the allegations in Paragraph 632 of Plaintiffs' Amended Complaint.

633. Defendants deny the allegations in Paragraph 633 of Plaintiffs' Amended Complaint.

634. Defendants deny the allegations in Paragraph 634 of Plaintiffs' Amended Complaint.

**ELEVENTH CLAIM FOR RELIEF**  
**FEDERAL RACKETEERING INFLUENCED CORRUPT**  
**ORGANIZATIONS ACT (“RICO”)**  
**18 U.S.C. § 1961 et seq. (2015)**

635. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

636. Paragraph 636 of Plaintiffs' Amended Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 636 of Plaintiffs' Amended Complaint.

637. Defendants deny the allegations in Paragraph 637 of Plaintiffs' Amended Complaint.

638. Defendants deny the allegations in Paragraph 638 of Plaintiffs' Amended Complaint.

639. Defendants deny the allegations in Paragraph 639 of Plaintiffs' Amended Complaint.

**The Alleged RICO Enterprise**

640. Defendants deny the allegations in Paragraph 640 of Plaintiffs' Amended Complaint.

641. Defendants deny the allegations in Paragraph 641 of Plaintiffs' Amended Complaint.

642. Defendants deny the allegations in Paragraph 642 of Plaintiffs' Amended Complaint.

643. Defendants deny the allegations in Paragraph 643 of Plaintiffs' Amended Complaint, except state Defendant ATJ provided certain lawful services to Defendant Midwest.

644. Defendants deny the allegations in Paragraph 644 of Plaintiffs' Amended Complaint.

645. Defendants deny the allegations in Paragraph 645 of Plaintiffs' Amended Complaint.

646. Defendants deny the allegations in Paragraph 646 of Plaintiffs' Amended Complaint.

647. Defendants deny the allegations in Paragraph 647 of Plaintiffs' Amended Complaint, except state Defendant ATJ provided certain lawful services to Defendant Midwest.

### **RICO Defendants' Alleged Roles in the Enterprise**

648. Defendants deny the allegations in Paragraph 648 of Plaintiffs' Amended Complaint except state Defendant ATJ provided certain lawful services to Defendant Midwest.

649. Defendants deny the allegations in Paragraph 649 of Plaintiffs' Amended Complaint except state Defendant ATJ provided certain lawful services to Defendant Midwest.

650. Defendants deny the allegations in Paragraph 650 of Plaintiffs' Amended Complaint except state Defendant ATJ provided certain lawful services to Defendant Midwest.

651. Defendants deny the allegations in Paragraph 651 of Plaintiffs' Amended Complaint except state Defendant ATJ provided certain lawful services to Defendant Midwest.

652. Defendants lack sufficient information to admit or deny the allegations in Paragraph 652 of Plaintiffs' Amended Complaint and therefore deny same.

653. Defendants lack sufficient information to admit or deny the allegations in Paragraph 653 of Plaintiffs' Amended Complaint and therefore deny same.

654. Defendants deny the allegations in Paragraph 654 of Plaintiffs' Amended Complaint.

655. Defendants deny the allegations in Paragraph 655 of Plaintiffs' Amended Complaint.

656. Defendants deny the allegations in Paragraph 656 of Plaintiffs' Amended Complaint.

**Alleged Predicate Acts  
Alleged Forced Labor: 18 U.S.C. § 1589**

657. Defendants deny the allegations in Paragraph 657 of Plaintiffs' Amended Complaint.

658. Defendants deny the allegations in Paragraph 658 of Plaintiffs' Amended Complaint.

659. Defendants lack sufficient information to admit or deny the allegations in Paragraph 659 of Plaintiffs' Amended Complaint and therefore deny same.

660. Defendants deny the allegations in Paragraph 660 of Plaintiffs' Amended Complaint.

**Alleged Trafficking in Persons for the Purposes of Forced Labor  
and Involuntary Servitude:  
18 U.S.C. § 1590 and Minn. Stat. § 609.281 et seq.**

661. Defendants deny the allegations in Paragraph 661 of Plaintiffs' Amended Complaint.

662. Defendants deny the allegations in Paragraph 662 of Plaintiffs' Amended Complaint.

663. Defendants deny the allegations in Paragraph 663 of Plaintiffs' Amended Complaint.

664. Defendants deny the allegations in Paragraph 664 of Plaintiffs' Amended Complaint.

665. Defendants deny the allegations in Paragraph 665 of Plaintiffs' Amended Complaint.

666. Defendants deny the allegations in Paragraph 666 of Plaintiffs' Amended Complaint, and all subparts therein.

667. Defendants deny the allegations in Paragraph 667 of Plaintiffs' Amended Complaint.

668. Defendants deny the allegations in Paragraph 668 of Plaintiffs' Amended Complaint.

**Alleged Immigration Document Fraud: 18 U.S.C. § 1546**

669. Defendants deny the allegations in Paragraph 669 of Plaintiffs' Amended Complaint.

670. Defendants deny the allegations in Paragraph 670 of Plaintiffs' Amended Complaint.

671. Defendants deny the allegations in Paragraph 671 of Plaintiffs' Amended Complaint.

672. With respect to Paragraph 672 of Plaintiffs' Amended Complaint, Defendants state that the referenced documents speak for themselves. Further answering, to the extent an additional response is required, Defendants deny the allegations in Paragraph 672 of Plaintiffs' Amended Complaint and/or any inference of liability contained therein.

673. With respect to Paragraph 673 of Plaintiffs' Amended Complaint, Defendants state that the referenced documents speak for themselves. Further answering,

to the extent an additional response is required, Defendants deny the allegations in Paragraph 673 of Plaintiffs' Amended Complaint and/or any inference of liability contained therein.

674. With respect to Paragraph 674 of Plaintiffs' Amended Complaint, Defendants state that the referenced documents speak for themselves. Further answering, to the extent an additional response is required, Defendants deny the allegations in Paragraph 674 of Plaintiffs' Amended Complaint and/or any inference of liability contained therein.

675. With respect to Paragraph 675 of Plaintiffs' Amended Complaint, Defendants state that the referenced documents speak for themselves. Further answering, to the extent an additional response is required, Defendants deny the allegations in Paragraph 675 of Plaintiffs' Amended Complaint and/or any inference of liability contained therein.

676. Defendants lack sufficient information to admit or deny the allegations in Paragraph 676 of Plaintiffs' Amended Complaint and therefore deny same.

677. Defendants lack sufficient information to admit or deny the allegations in Paragraph 677 of Plaintiffs' Amended Complaint and therefore deny same.

678. Defendants lack sufficient information to admit or deny the allegations in Paragraph 678 of Plaintiffs' Amended Complaint and therefore deny same.

679. Defendants lack sufficient information to admit or deny the allegations in Paragraph 679 of Plaintiffs' Amended Complaint and therefore deny same.

680. Defendants lack sufficient information to admit or deny the allegations in Paragraph 680 of Plaintiffs' Amended Complaint and therefore deny same.

681. Defendants lack sufficient information to admit or deny the allegations in Paragraph 681 of Plaintiffs' Amended Complaint and therefore deny same.

682. Defendants deny the allegations in Paragraph 682 of Plaintiffs' Amended Complaint.

**Alleged Mail Fraud: 18 U.S.C. § 1341**

683. Defendants deny the allegations in Paragraph 683 of Plaintiffs' Amended Complaint.

684. Defendants deny the allegations in Paragraph 684 of Plaintiffs' Amended Complaint.

685. Defendants deny the allegations in Paragraph 685 of Plaintiffs' Amended Complaint.

686. Defendants deny the allegations in Paragraph 686 of Plaintiffs' Amended Complaint.

687. Defendants deny the allegations in Paragraph 687 of Plaintiffs' Amended Complaint.

**Alleged Wire Fraud: 18 U.S.C. § 1343**

688. Defendants deny the allegations in Paragraph 688 of Plaintiffs' Amended Complaint.

689. Defendants deny the allegations in Paragraph 689 of Plaintiffs' Amended Complaint.

690. Defendants deny the allegations in Paragraph 690 of Plaintiffs' Amended Complaint.

691. Defendants deny the allegations in Paragraph 691 of Plaintiffs' Amended Complaint, except state Defendant ATJ communicated with Defendant Midwest.

692. Defendants deny the allegations in Paragraph 692 of Plaintiffs' Amended Complaint, except state Defendant ATJ communicated with Defendant Midwest.

693. Defendants deny the allegations in Paragraph 693 of Plaintiffs' Amended Complaint.

694. Defendants deny the allegations in Paragraph 694 of Plaintiffs' Amended Complaint.

#### **Alleged Pattern of Racketeering Activity**

695. Defendants deny the allegations in Paragraph 695 of Plaintiffs' Amended Complaint.

696. Defendants deny the allegations in Paragraph 696 of Plaintiffs' Amended Complaint.

697. Defendants deny the allegations in Paragraph 697 of Plaintiffs' Amended Complaint.

698. Defendants deny the allegations in Paragraph 698 of Plaintiffs' Amended Complaint.

699. Defendants deny the allegations in Paragraph 699 of Plaintiffs' Amended Complaint.

700. Defendants deny the allegations in Paragraph 700 of Plaintiffs' Amended Complaint.

701. Defendants deny the allegations in Paragraph 701 of Plaintiffs' Amended Complaint.

702. Defendants deny the allegations in Paragraph 702 of Plaintiffs' Amended Complaint.

### **Alleged Conspiracy**

703. Defendants deny the allegations in Paragraph 703 of Plaintiffs' Amended Complaint.

704. Defendants deny the allegations in Paragraph 704 of Plaintiffs' Amended Complaint.

705. Defendants deny the allegations in Paragraph 705 of Plaintiffs' Amended Complaint.

706. Defendants deny the allegations in Paragraph 706 of Plaintiffs' Amended Complaint.

707. Defendants deny the allegations in Paragraph 707 of Plaintiffs' Amended Complaint.

708. Defendants deny the allegations in Paragraph 708 of Plaintiffs' Amended Complaint.

709. Defendants deny the allegations in Paragraph 709 of Plaintiffs' Amended Complaint.

710. Defendants deny the allegations in Paragraph 710 of Plaintiffs' Amended Complaint.

711. Defendants deny the allegations in Paragraph 711 of Plaintiffs' Amended Complaint.

712. Defendants deny the allegations in Paragraph 712 of Plaintiffs' Amended Complaint.

713. Defendants deny the allegations in Paragraph 713 of Plaintiffs' Amended Complaint.

714. Defendants deny the allegations in Paragraph 714 of Plaintiffs' Amended Complaint.

715. Defendants deny the allegations in Paragraph 715 of Plaintiffs' Amended Complaint.

716. Defendants deny the allegations in Paragraph 716 of Plaintiffs' Amended Complaint.

#### **Alleged Injury**

717. Defendants deny the allegations in Paragraph 717 of Plaintiffs' Amended Complaint.

718. Defendants deny the allegations in Paragraph 718 of Plaintiffs' Amended Complaint.

**TWELFTH CLAIM FOR RELIEF**  
**ASSAULT**

719. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

720. With respect to Paragraph 720 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 720 of Plaintiffs' Amended Complaint.

721. With respect to Paragraph 721 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 721 of Plaintiffs' Amended Complaint.

722. With respect to Paragraph 722 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 722 of Plaintiffs' Amended Complaint.

723. With respect to Paragraph 723 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 723 of Plaintiffs' Amended Complaint.

724. With respect to Paragraph 724 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 724 of Plaintiffs' Amended Complaint.

725. With respect to Paragraph 725 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 725 of Plaintiffs' Amended Complaint.

726. With respect to Paragraph 726 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 726 of Plaintiffs' Amended Complaint.

727. With respect to Paragraph 727 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 727 of Plaintiffs' Amended Complaint.

**THIRTEENTH CLAIM FOR RELIEF**  
**BATTERY**

728. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

729. With respect to Paragraph 729 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 729 of Plaintiffs' Amended Complaint.

730. With respect to Paragraph 730 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 730 of Plaintiffs' Amended Complaint.

731. With respect to Paragraph 731 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 731 of Plaintiffs' Amended Complaint.

732. With respect to Paragraph 732 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 732 of Plaintiffs' Amended Complaint.

733. With respect to Paragraph 733 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 733 of Plaintiffs' Amended Complaint.

734. With respect to Paragraph 734 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 734 of Plaintiffs' Amended Complaint.

735. With respect to Paragraph 735 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 735 of Plaintiffs' Amended Complaint.

**FOURTEENTH CLAIM FOR RELIEF**  
**BREACH OF H-2B CONTRACT**

736. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

737. With respect to Paragraph 737 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 737 of Plaintiffs' Amended Complaint.

738. With respect to Paragraph 738 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 738 of Plaintiffs' Amended Complaint.

739. With respect to Paragraph 739 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 739 of Plaintiffs' Amended Complaint.

740. With respect to Paragraph 740 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 740 of Plaintiffs' Amended Complaint.

741. With respect to Paragraph 741 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 741 of Plaintiffs' Amended Complaint.

742. With respect to Paragraph 742 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 742 of Plaintiffs' Amended Complaint.

743. With respect to Paragraph 743 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 743 of Plaintiffs' Amended Complaint.

744. With respect to Paragraph 744 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 744 of Plaintiffs' Amended Complaint.

745. With respect to Paragraph 745 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 745 of Plaintiffs' Amended Complaint.

746. With respect to Paragraph 746 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 746 of Plaintiffs' Amended Complaint.

747. With respect to Paragraph 747 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 747 of Plaintiffs' Amended Complaint.

748. With respect to Paragraph 748 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 748 of Plaintiffs' Amended Complaint.

749. With respect to Paragraph 749 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 749 of Plaintiffs' Amended Complaint.

**FIFTEENTH CLAIM FOR RELIEF**  
**PROMISSORY ESTOPPEL**

750. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

751. Defendants deny the allegations in Paragraph 751 of Plaintiffs' Amended Complaint.

752. Defendants deny the allegations in Paragraph 752 of Plaintiffs' Amended Complaint.

753. Defendants deny the allegations in Paragraph 753 of Plaintiffs' Amended Complaint.

754. Defendants deny the allegations in Paragraph 754 of Plaintiffs' Amended Complaint.

755. Defendants deny the allegations in Paragraph 755 of Plaintiffs' Amended Complaint.

756. Defendants deny the allegations in Paragraph 756 of Plaintiffs' Amended Complaint.

757. Defendants deny the allegations in Paragraph 757 of Plaintiffs' Amended Complaint.

**SIXTEENTH CLAIM FOR RELIEF**  
**UNJUST ENRICHMENT AND QUANTUM MERUIT**

758. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

759. With respect to Paragraph 759 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 759 of Plaintiffs' Amended Complaint.

760. With respect to Paragraph 760 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 760 of Plaintiffs' Amended Complaint.

761. With respect to Paragraph 761 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 761 of Plaintiffs' Amended Complaint.

762. With respect to Paragraph 762 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 762 of Plaintiffs' Amended Complaint.

763. With respect to Paragraph 763 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 763 of Plaintiffs' Amended Complaint.

764. With respect to Paragraph 764 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 764 of Plaintiffs' Amended Complaint.

765. With respect to Paragraph 765 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 765 of Plaintiffs' Amended Complaint.

766. With respect to Paragraph 766 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 766 of Plaintiffs' Amended Complaint.

**SEVENTEENTH CLAIM FOR RELIEF**  
**MINNESOTA BIAS OFFENSE**  
**Minn. Stat. § 611A.79 (2015)**

767. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

768. Paragraph 768 of Plaintiffs' Amended Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required, Defendants state that the information provided in Paragraph 768 of Plaintiffs' Amended Complaint speaks for itself.

769. Defendants deny the allegations in Paragraph 769 of Plaintiffs' Amended Complaint.

770. Defendants deny the allegations in Paragraph 770 of Plaintiffs' Amended Complaint.

771. Defendants deny the allegations in Paragraph 771 of Plaintiffs' Amended Complaint.

772. Defendants deny the allegations in Paragraph 772 of Plaintiffs' Amended Complaint.

773. Defendants deny the allegations in Paragraph 773 of Plaintiffs' Amended Complaint.

**EIGHTEENTH CLAIM FOR RELIEF**  
**COMMON LAW FRAUD**

774. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

775. Paragraph 775 of Plaintiffs' Amended Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required, Defendants state that the information provided in Paragraph 775 of Plaintiffs' Amended Complaint speaks for itself.

776. Defendants deny the allegations in Paragraph 776 of Plaintiffs' Amended Complaint.

777. Defendants deny the allegations in Paragraph 777 of Plaintiffs' Amended Complaint.

778. Defendants deny the allegations in Paragraph 778 of Plaintiffs' Amended Complaint.

779. Defendants deny the allegations in Paragraph 779 of Plaintiffs' Amended Complaint.

780. Defendants deny the allegations in Paragraph 780 of Plaintiffs' Amended Complaint.

781. Defendants deny the allegations in Paragraph 781 of Plaintiffs' Amended Complaint.

782. Defendants deny the allegations in Paragraph 782 of Plaintiffs' Amended Complaint.

783. Defendants deny the allegations in Paragraph 783 of Plaintiffs' Amended Complaint.

**NINETEENTH CLAIM FOR RELIEF**  
**INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS**

784. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

785. With respect to Paragraph 785 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 785 of Plaintiffs' Amended Complaint.

786. With respect to Paragraph 786 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 786 of Plaintiffs' Amended Complaint.

787. With respect to Paragraph 787 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 787 of Plaintiffs' Amended Complaint.

788. With respect to Paragraph 788 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 788 of Plaintiffs' Amended Complaint.

789. With respect to Paragraph 789 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 789 of Plaintiffs' Amended Complaint.

790. With respect to Paragraph 790 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 790 of Plaintiffs' Amended Complaint.

791. With respect to Paragraph 791 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 791 of Plaintiffs' Amended Complaint.

**TWENTIETH CLAIM FOR RELIEF**  
**NEGLIGENT INFILCTION OF EMOTIONAL DISTRESS**

792. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

793. With respect to Paragraph 793 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 793 of Plaintiffs' Amended Complaint.

794. With respect to Paragraph 794 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is

required. To the extent a response is required, Defendants deny the allegations in Paragraph 794 of Plaintiffs' Amended Complaint.

795. With respect to Paragraph 795 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 795 of Plaintiffs' Amended Complaint.

796. With respect to Paragraph 796 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 796 of Plaintiffs' Amended Complaint.

797. With respect to Paragraph 797 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 797 of Plaintiffs' Amended Complaint.

798. With respect to Paragraph 798 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 798 of Plaintiffs' Amended Complaint.

799. With respect to Paragraph 799 of Plaintiffs' Amended Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 799 of Plaintiffs' Amended Complaint.

**TWENTY-FIRST CLAIM FOR RELIEF**  
**MEXICAN FEDERAL LABOR LAW**

800. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

801. Paragraph 801 of Plaintiffs' Amended Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required, Defendants state that the information provided in Paragraph 801 of Plaintiffs' Amended Complaint speaks for itself.

802. Paragraph 802 is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 802 of Plaintiffs' Amended Complaint.

803. Defendants deny the allegations in Paragraph 803 of Plaintiffs' Amended Complaint.

804. Defendants deny the allegations in Paragraph 804 of Plaintiffs' Amended Complaint.

805. Defendants deny the allegations in Paragraph 805 of Plaintiffs' Amended Complaint.

806. Defendants deny the allegations in Paragraph 806 of Plaintiffs' Amended Complaint.

**ALLEGED PRAYER FOR RELIEF**

Defendants deny Plaintiffs' right to the damages or relief requested in the Amended Complaint, and deny Plaintiffs' right to any other damages or relief related to

the Amended Complaint, including any and all relief requested in Plaintiffs' "Prayer for Relief" Section.

**AFFIRMATIVE AND OTHER DEFENSES**

Further answering, Defendants allege the following affirmative and other defenses:

807. Plaintiffs' Amended Complaint fails, in whole or in part, to state a claim upon which relief may be granted, including but not limited to failing to state a claim under the cited statutory provisions. Further, Plaintiffs' Amended Complaint fails to state facts sufficient to state a claim that would support an award of actual, compensatory, punitive, or other damages against Defendants.

808. Plaintiffs' claims against Defendants must be dismissed because this Court lacks personal jurisdiction.

809. Plaintiffs' claims against Defendants must be dismissed for improper venue.

810. Plaintiffs' claims against Defendants must be dismissed to the extent the Court lacks subject matter and/or supplemental jurisdiction over those claims.

811. Plaintiffs' Amended Complaint is barred, in whole or in part, because of the applicable statutes of limitations and/or because of other applicable statutory requirements.

812. Plaintiffs have failed to identify any actionable fraud or misrepresentation claim with the requisite specificity, and they therefore cannot establish the elements of their claims.

813. Plaintiffs' Amended Complaint fails because Defendants did not make any false representations to Plaintiffs and there were no statements made with knowledge of falsity or with disregard for their truth or falsity.

814. Plaintiffs' Amended Complaint fails, in whole or in part, because Plaintiffs consented to, ratified, and/or invited the alleged conduct about which they now complain.

815. Plaintiffs' Amended Complaint fails because Defendants did not have the requisite intent to induce Plaintiffs to act in reliance on any alleged statements or representations.

816. Plaintiffs' Amended Complaint fails because any representations or statements made by Defendants did not cause Plaintiffs to act in reliance thereon.

817. Plaintiffs' Amended Complaint fails because any reliance based on any statements was not justifiable.

818. Plaintiffs' RICO claim is barred, in whole or in part, for failure of proximate cause.

819. Plaintiffs' claims fail, in whole or in part, because there was no conspiracy.

820. Plaintiffs' claimed damages are barred, in whole or in part, because Plaintiffs suffered no recoverable damages, Plaintiffs failed to mitigate their alleged damages, if any, and Plaintiffs' damages, if any, are limited by operation of the claims they have made.

821. Plaintiffs' claims and/or claimed damages fail, in whole or in part, to the extent Plaintiffs seek multiple recoveries for the same alleged conduct.

822. Plaintiffs' claimed damages are barred to the extent the cited statutes do not permit the relief requested.

823. Plaintiffs' claimed damages, if any, were caused by their own conduct or by the conduct of other persons or entities over whom/which Defendants had no control and for whose conduct Defendants are not liable.

824. Plaintiffs' Amended Complaint fails, in whole or in part, because Defendants acted in good faith, upon proper occasion, and with proper motive. Defendants' conduct with respect to Plaintiffs was not in violation of any statute, law, rule, regulation, or ordinance. No action taken by Defendants with respect to Plaintiffs was unlawful and/or willful as a matter of law.

825. Plaintiffs' Amended Complaint fails because of bars to recovery such as waiver, estoppel, and/or unclean hands.

826. The extent to which Plaintiffs' Amended Complaint may be barred by any remaining affirmative or other defenses, including those contemplated by Rule 8 of the Federal Rules of Civil Procedure, cannot be determined at this time without the benefit of discovery. Thus, as separate and alternative defenses to Plaintiffs' Amended Complaint, Defendants reserve their right to assert all affirmative and other defenses as appropriate.

WHEREFORE, Defendants request a trial by jury and the following relief:

- (a) That the Court dismiss the Amended Complaint with prejudice, in its entirety;
- (b) That the Court deny Plaintiffs the relief prayed for in the Amended Complaint; and

(c) That the Court award Defendants their costs, disbursements and such further relief as the Court deems just and equitable.

Dated: September 6, 2016

OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P. C.

*s/Colton D. Long*

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